

From: DTSCPublicMeeting@DTSC
To: Singh, Mike@DTSC
Subject: FW: Agenda item 6 public comment
Date: Monday, October 17, 2016 9:40:08 AM

From: Denise Duffield [dduffield@psr-la.org]
Sent: Friday, October 14, 2016 9:23 AM
To: DTSCPublicMeeting@DTSC
Subject: Agenda item 6 public comment

DTSC's response to the IRP's request for a detailed response to the People's Senate site specific benchmarks was incomplete, inadequate, and insulting to impacted communities. Time and again, DTSC either provided false or misleading information, or, as in the case of the Santa Susana Field Laboratory (SSFL) ignored Peoples Senate concerns and benchmarks entirely. All DTSC did for SSFL was to copy and paste the same sparse and meaningless information it had provided to the IRP for its September 20 meeting, reflecting an utter disregard for the community.

Regarding the CAG program, it is absurd for DTSC to suggest that it needs statutory authority to act upon or enforce its own CAG handbook. DTSC is simply looking for an excuse to justify the fact that it has allowed the SSFL CAG to be composed of individuals with ties to the response parties who do not in any way reflect the concerns of the larger SSFL community.

Chapter 6.8, Section 25358.7.1 of the California Health and Safety Code states, "to the extent possible, the composition of each community advisory group shall reflect the composition of the affected community and the diversity of interests of the community..." What further statutory authority does DTSC need?

If CAGs are to have any association with DTSC, and use that association to provide credibility for their positions - especially while lobbying elected officials, as the SSFL CAG has done - then DTSC needs to hold CAGs accountable. DTSC can and should be able to stop sanctioning CAGs for a variety of reasons, including - as in the case of the SSFL CAG, - spreading misinformation, aggressively disparaging other community members, having ties to the polluters, and lobbying elected officials against the department's own signed cleanup agreements. If CAG's are created and sanctioned by DTSC, DTSC should not need any "authority" to pull the plug when a CAG's actions are dishonest or harmful. The IRP recommendations should reflect this.

Regarding the IRP recommendation for funding studies to determine association between SSFL and cancer clusters, the SSFL community requests that this recommendation be modified to include a provision that the community have full input as to who conducts any such studies, to ensure the studies are indeed unbiased and independent. For example, DTSC has previously partnered with Dr. Thomas Mack, a known skeptic of environmental causes of cancer, to tell the community that SSFL contaminants have not caused cancer - despite several federally funded studies that suggest otherwise. The SSFL community insists that any such studies be conducted by a non-governmental agency and an entity that has been approved by the community.

The SSFL CAG has been secretly funded by the Department of Energy, one of the polluters at SSFL, which is fully aware of the CAG's efforts to undo the cleanup agreements it signed with DTSC. DOE is in effect now paying the CAG to help it evade its cleanup obligations. The SSFL community has repeatedly pointed out the IRP the false and misleading information that the CAG disseminates about the cleanup.

Yet at the Sept. 20 meeting in Chatsworth, the IRP told CAG member Alec Uzameck that it hopes it will use the DOE funds to help the community find "compromise." This is an outrageous slap in the face to those who have worked for decades for

the cleanup agreements. Agreements supported by the vast majority of the community have been signed. They need to be followed. There does not need to be "compromise" by breaking the agreements and allowing vastly more contamination to remain on site where it will continue to threaten nearby communities. That is what the DOE is paying the CAG to do, that is why it is wrong, and it is absurd for the IRP to endorse a sabotage of the cleanup agreements and subversion of the community's will and best interests.

As said many times, there are not two sides to the SSFL community. There is a community that wants the cleanup agreements upheld and a small but vocal handful of people, most of whom have ties to the responsible parties and are members of the SSFL CAG, who do not. Of those who spoke at the Sept. 20 meeting, nearly three times as many were in favor of the agreements as not. The community wants the agreements upheld, not the dragging of feet by DTSC and the agencies to see if the next administration will be more favorable to a break out.

Like many other impacted communities, the SSFL community has no confidence in DTSC. It is unlikely that any IRP recommendations, or any systems, structures, or programs, will truly help communities if DTSC continues to disregard them and place polluter interests before public health. DTSC's report to the IRP regarding the Peoples Senate concerns only reaffirms its disinterest and contempt for communities, who will pay the price with their health.

Denise

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