June 6, 2022

James Stahl, Acting Chair and Members of the Board
Los Angeles Regional Water Quality Control Board
Via email to: Renee.Purdy@waterboards.ca.gov

Re: Request to Continue Consideration of Memorandum of Understanding (MOU)
Between the Los Angeles Regional Water Quality Control Board and the Boeing
Company Related to Santa Susana Field Laboratory (Item # 7 on June 9 Agenda)
for Two Months

Dear Acting Chair Stahl and Members of the Los Angeles Regional Water Quality Control
Board:

As the County Supervisor for southwestern Ventura County, I am writing to respectfully
ask the Los Angeles Regional Water Quality Control Board (Water Board) to continue
Item No. 7 on its June 9th agenda for two months to allow the County of Ventura and
other local agencies and the public adequate time to review the proposed Memorandum
of Understanding (MOU) (which, with exhibits, totals over 290 pages) and the coordinated
790+ page settlement agreement between the Department of Toxic Substances Control
(DTSC) and Boeing (Settlement Agreement).

As you are likely aware, the MOU and Settlement Agreement set forth key conditions for
Boeing Company’s cleanup of the highly toxic chemical and radioactive contamination at
the Santa Susana Field Lab (SSFL) in Ventura County. The Settlement Agreement was
negotiated, prepared, and approved without representatives of the public. There has been
no ability for review or input by the County of Ventura, or to our knowledge other local
governments or the public. The effects of the Settlement Agreement and MOU on the
amount of chemical contamination that will be left on site, and your Board’s reduced
oversight will be substantial and far reaching for communities near SSFL site and warrant
adequate agency, expert, and public review.

The MOU staff report does not provide a substantially compelling reason for haste in
approving the MOU. Any slight acceleration of clean-up efforts after decades of delay is
significantly outweighed by the need for adequate public and expert review.
Additionally, the Settlement Agreement and MOU have implications for clean-up of the federal portions of the site, which are highly contaminated with radionuclides. Action of the Water Board regarding SSFL should also address the clean-up of radionuclides on the federal lands, and radionuclide clean-up standards and protocols should be made consistent across the entire SSFL site.

I and many others have been working on this issue for decades, and approving the MOU and Settlement Agreement without adequate time for the public and other government agencies to review this highly complex regulatory document would be problematic and potentially lead to even more conflict in the future. I respectfully request a two-month continuance of this item.

Sincerely,

Linda Parks
Supervisor, Second District