Santa Susana Field Laboratory

SITE REMEDIATION PROGRAM

State Clearinghouse Number: 2013111068

Addendum to the Certified Program EIR

Prepared by

California Environmental Protection Agency

Department of Toxic Substances Control

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CHAPTER 1

Introduction

The California Department of Toxic Substances Control (DTSC), in its capacity as the California Environmental Quality Act (CEQA) lead agency, prepared a Program Environmental Impact Report (PEIR) to evaluate the potentially significant environmental effects associated with soil and groundwater remediation activities and other activities associated with the termination of operations at the Santa Susana Field Laboratory (SSFL) site (also referred to as the project). DTSC certified the PEIR on July 19, 2023 ("Certified PEIR").

1.1 Purpose of this Addendum to the Certified PEIR

DTSC has prepared this addendum to address additional information DTSC received after certification of the PEIR, as well as errata to the Certified PEIR. CEQA and CEQA Guidelines establish standards for when subsequent environmental review is required after an EIR is certified. Pursuant to Public Resources Code (PRC) Section 21166:

> When an environmental impact report has been prepared for a project pursuant to this division, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency, unless one or more of the following events occur:
>
> a. Substantial changes are proposed in the project which will require major revisions of the environmental impact report.
> b. Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.
> c. New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

None of the events specified in PRC Section 21166, in which a subsequent or supplemental EIR would be required, have occurred here. First, since the PEIR was certified, no "[s]ubstantial changes are proposed in the project which will require major revisions" of the PEIR. Second, no substantial changes have occurred "with respect to the circumstances under which the project is being undertaken which will require major revisions" in the PEIR. Third, no "[n]ew

information which was not known and could not have been known" at the time the PEIR was certified as complete has become available.

Here, DTSC received additional information after certifying the PEIR concerning occurrences of mountain lions and Crotch's bumble bees (CBB) on the project site. However, this information was available to others involved in commenting on the PEIR and therefore could have been provided to DTSC before the PEIR was certified.

Briefly, additional information regarding mountain lions was provided to DTSC by the Santa Ynez Band of Chumash Indians in October of 2023 based on two reports dated 2021[1] and 2023[2]. Additional information regarding mountain lion occurrences was provided to DTSC by the National Park Service in 2024[3] based on tracking data gathered between 2018 and 2023. The additional information on the CBB was based on observations made between 2019 and 2022 and reported to CDFW beginning in 2020, but was not brought to DTSC's attention until 2024 by Boeing. Accordingly, all of this additional information was known by others prior to the certification of the PEIR. More detail on the additional mountain lion and CBB information is provided below and in Chapter 2 of this Addendum.

CEQA Guidelines Section 15162(a)(3) provides additional criteria for determining when newly available information triggers the requirement for a subsequent or supplemental EIR under Public Resources Code Section 21166(c). It provides:

> New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified or the negative declaration was adopted shows any of the following:

[1] Resource Conservation District of the Santa Monica Mountains (RCDSMM) with SC Wildlands (formerly South Coast Wildlands). 2021. STATE OF THE LINKAGE REPORT: East Branch of Santa Monica-Sierra Madre Mountains Connection (January 2021). Available at: https://www.dtsc-ssfl.com/files/lib_ceqa/linkage_reports/70906_2021.01_RCDSMM_State_of_the_Linkage_Report.pdf.

[2] Resource Conservation District of the Santa Monica Mountains (RCDSMM), 2023, STATE OF THE LINKAGE REPORT Update 2023, East Branch of the Santa Monica-Sierra Madre Mountains Connection (September 2023). Available at: https://www.dtsc-ssfl.com/files/lib_ceqa/linkage_reports/70907_2023.09.28_RCDSMM_State_of_the_Linkage_Update_2023_Report.pdf.

[3] National Park Service, 2024. Letter from Seth Riley, National Park Service, to DTSC, regarding *Statement about the Importance of the Santa Susana Field Lab property, Ventura, County, CA, for Wildlife, based on National Park Service studies,* August. Available at: https://www.dtsc-ssfl.com/files/lib_correspond/letters/70909_2024.08.14_NPS_Letter_to_DTSC_Importance_of_SSFL_for_Wildlife.pdf.

a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The additional information regarding mountain lions and the CBB does not meet any of the above criteria. The additional information does not show that the project will have one or more significant effects that were not disclosed in the PEIR or substantially more severe environmental effects than were disclosed in the PEIR, and there are no feasible mitigation measures or alternatives that would substantially reduce the project's significant environmental effects that the project proponent declines to adopt. Accordingly, the additional information does not meet the threshold of CEQA Guidelines Section 15162(a)(3) and does not constitute one of the events requiring a subsequent or supplemental EIR under Public Resources Code Section 21166.

Instead, DTSC determined that an addendum to the Certified PEIR is the appropriate vehicle to address the newly available information. CEQA Guidelines Section 15164(a) provides that a lead agency shall prepare an addendum to a previously certified EIR where "some changes or additions are necessary," but where Section 15162 does not otherwise require the preparation of a subsequent or supplemental EIR. Thus, pursuant to CEQA Guidelines Section 15164(a), DTSC has prepared this Addendum to address the additional information it received after certification of the PEIR. Although this Addendum is not required to be circulated for public review, DTSC will consider this Addendum along with the Certified PEIR, prior to making a decision on the project, as required by CEQA Guidelines Section 15164(d).

1.2 Project Summary and Status

1.2.1 Project Location

The approximately 2,850-acre SSFL site is located in the southeastern-most part of Ventura County and adjacent to Los Angeles County, California. The SSFL site is divided into administrative Areas I through IV and the Northern and Southern Undeveloped Areas (see Certified PEIR Figure 2-1). These administrative areas generally represent distinct land ownership, cleanup responsibility, and cleanup requirements.

1.2.2 Regulatory Orders and Cleanup Requirements

There are three parties responsible for the cleanup at SSFL: The Boeing Company (Boeing), the United States Department of Energy (DOE), and the National Aeronautics and Space Administration (NASA) (collectively, Responsible Parties). The cleanup will be conducted in part pursuant to the Corrective Action Program of the federal Resource Conservation and Recovery Act (RCRA). In California, DTSC implements RCRA under delegated authority from the United States Environmental Protection Agency (USEPA) through state law, specifically Chapter 6.5 of Division 20 of the California Health and Safety Code (California Hazardous Waste Control Law). In addition, the cleanup of soil by the federal agencies (i.e., DOE and NASA) is being conducted under Division 45 of the California Health and Safety Code (the Carpenter-Presley-Tanner Hazardous Substance Account Act).

In 2007, the Responsible Parties and DTSC executed a Consent Order for Corrective Action (2007 Consent Order) that defined the requirements for investigating and implementing cleanup of contaminated soil and groundwater at SSFL. In 2010, DOE and NASA subsequently entered into two separate Administrative Orders on Consent (AOCs) that govern soil remediation in their respective areas of responsibility at SSFL. Groundwater remediation in the DOE and NASA areas continues to be regulated under the 2007 Consent Order. In 2022, DTSC and Boeing entered into a settlement agreement (2022 Settlement Agreement) that amends the 2007 Consent Order with respect to the Boeing areas of responsibility at SSFL. The 2022 Settlement Agreement sets forth the processes and methodologies for cleanup of the Boeing areas of responsibility at SSFL. Thus, DOE and NASA's cleanup obligations are prescribed by the 2007 Consent Order coupled with the respective 2010 AOCs, and Boeing's cleanup obligations are prescribed by the 2007 Consent Order, as amended by the 2022 Settlement Agreement.

1.2.3 Description of the Proposed Project

This Addendum does not include or propose any changes to the project. A detailed description of the project can be found in the Certified PEIR (Revised Draft PEIR Chapter 3, Project Description). However, for context, a brief summary of activities associated with the project is provided here.

The overall project evaluated the following remedial actions:

- Soil Remediation – Soil remediation methods considered in the PEIR included: (1) excavation and offsite disposal (excavation and backfilling, construction equipment and staging, soil removal and transport, disposal, dewatering, and restoration revegetation); (2) soil vapor extraction (SVE) (SVE system, SVE decommissioning, and restoration); (3) biological treatment (bioventing, gaseous electron donor injection technology, *ex situ* biological treatment, monitored natural attenuation); (4) phytoremediation; (5) physical remediation methods (soil washing/partitioning, soil solidification/stabilization, and thermal desorption); and (6) capping and onsite management.

  Certain areas of contaminated soil are located within sensitive biological resources (e.g., habitat or species specifically protected under the federal or California Endangered Species Acts) or cultural resources (e.g., Native American or paleontological artifacts) zones. In these areas, remediation options may be more limited and cleanup goals may be adjusted to accommodate the protection of such resources. These types of adjustments would occur at the time site-specific cleanup plans are developed. The cleanup decision documents will evaluate on a case-by-case basis any impacted soils that are proposed to be exempted from site-specific cleanup plans to preserve biological and cultural resources (Exception Areas) with decisions based on the degree of soil contamination and value of the resources.

- Groundwater and Unweathered Bedrock Remediation – The methods considered for groundwater and/or vadose zone cleanup in the PEIR included: (1) groundwater extraction and treatment (pump and treat); (2) thermal enhanced vapor extraction; (3) *in situ* chemical oxidation; (4) *in situ* enhanced biological treatment, air sparging and vapor extraction; (5) monitored natural attenuation and institutional controls; (5) passive treatment at seeps; (6) bedrock removal (for strontium-90); and (7) bedrock vapor extraction.

- Decommissioning of Monitoring Wells and Former Water Supply Wells-–-Monitoring wells and former water supply wells within the project site would be decommissioned in place by grouting with bentonite cement grout.

In addition, the Certified PEIR evaluated initial activities that would be implemented after certification and would occur over approximately 3 to 5 years. These initial activities would consist primarily of soil excavation, bedrock removal, building and structure demolition and extraction, and offsite disposal of soil, bedrock, and demolition debris.

1.2.4 Project Status

The following activities are currently underway at SSFL:

- Area I Burn Pit Interim Measure – In 2022, DTSC issued an Imminent and Substantial Endangerment (IS&E) Order for the Area I Burn Pit (AIBP) to address contamination of AIBP soils with radionuclides, PCBs, dioxins, PCP, TCE, cadmium, mercury, molybdenum, nickel, and zinc, resulting from AIBP operations between 1958 and 1971. Boeing commenced soil excavation and removal activities under the IS&E Order in March of 2024, and completion is anticipated in Winter 2026. Boeing removed approximately 15,000 CY of contaminated soil from the site in accordance with a DTSC-approved AIBP Final Removal Action Work Plan. Any contamination remaining in the AIBP after the completion of interim measure activities will be addressed as part of the final, sitewide, soil remediation.

- Former Rocketdyne Shooting Range Soil Cleanup – In 2022, DTSC issued an IS&E Order for the Former Rocketdyne Shooting Range and Overshot Area (Former Shooting Range), to address lead, PAH, antimony, and arsenic contamination at the Former Shooting Range. Although the Former Shooting Range is located adjacent to, rather than within, the SSFL site, cleanup activities required under this IS&E Order were included in the Certified PEIR to provide a conservative analysis of project impacts. In June 2023, Boeing began soil excavation and removal activities at the Former Shooting Range to address contamination caused by lead shot and clay pigeon target fragments in accordance with the DTSC-approved Shooting Range Removal Action Work Plan and Addendum. These activities were completed in January 2025.

- NASA Phase 1 Groundwater Remedy – In April 2025, DTSC issued a Draft Statement of Basis (remedy decision document) under the

Resources Conservation and Recovery Act (RCRA), as delegated to DTSC under state law, to solicit public comment on its proposed environmental cleanup decision for four Target Treatment Areas (TTAs) of groundwater and bedrock vapor contamination at NASA administered federal property at the SSFL. The four specific NASA areas proposed for remediation under Phase 1 have been designated as the ND-136 TTA, WS-09 TTA, C-6 TTA, and the Southern Seep Area TTA. The proposed remediation technologies for cleanup in Phase 1 include Enhanced In-Situ Bioremediation (EISB), Bedrock Vapor Extraction (BVE), Monitored Natural Attenuation (MNA), and Groundwater Pump and Treat (P&T), with a combination of multiple technologies proposed at each location. Remediation measures for all other NASA groundwater contamination, including other contaminants of concern in the Phase 1 areas, will be addressed in NASA's Phase 2 Groundwater CMS, which will be presented with a future Phase 2 Statement of Basis for public review and comment. The selected Phase 1 groundwater corrective action is anticipated to begin implementation in 2026, and remedial measures will be conducted over the course of several decades.

- Boeing Surficial Media Operable Unit (Soil and Soil Vapor) Remedy – In September 2025, DTSC issued a Draft Statement of Basis under RCRA, to solicit public comment and to explain the rationale for the proposed Surficial Media Operable Unit (SMOU) remedy decision in Boeing areas of responsibility within Areas I, III, and Subarea 10 (Boeing areas of responsibility) at the SSFL. The Draft Statement of Basis proposes to address contamination across the approximately 130-acre[4] total Boeing Corrective Measures Study area footprint through approximately 80 acres of soil excavation and approximately 31 acres of soil vapor extraction. There is no excavation or soil vapor extraction proposed in approximately 19 acres for the protection of cultural and biological resources. In these exception areas, no remediation will occur where overlapping biological and cultural resources are present. In the future, DTSC will require enforceable land use restrictions under California Civil Code section 1471 for the approximately 19 acres in Boeing areas of responsibility that will not meet the corrective action objectives for protection of Resident with

2 This estimation includes overlapping footprints for soil excavation and soil vapor extraction to match what is included in the Boeing SMOU CMS Report. The total overall acreage included in the analysis (without overlap) is approximately 113 acres. Excavation or soil vapor extraction will not occur in approximately 19 acres to allow for protection of cultural and biological resources. Excavation and/or soil vapor extraction will cover approximately 94 acres

Garden. Implementation of the final remedy is anticipated to begin in Summer 2026.

1.3 Additions to the Certified PEIR

This Addendum addresses additional information regarding certain biological and cultural resources in the SSFL area that was provided to DTSC after certification of the PEIR. It also provides an errata to make minor revisions to the PEIR.

Mountain Lions

In October 2023, the Santa Ynez Band of Chumash Indians provided DTSC with two reports pertaining to the mountain lion and its presence and use of the SSFL site and its relevance to tribes. These reports, commissioned by the Santa Ynez Band of Chumash Indians and prepared by the Resource Conservation District of the Santa Monica Mountains (RCDSMM), are respectively entitled the *State of the Linkage Report: East Branch of the Santa Monica-Sierra Madre Mountains Connection* (2021 Linkage Report) and *State of the Linkage Update: East Branch of the Santa Monica-Sierra Madre Mountains Connection* (2023 Linkage Report Update) (collectively referred to as the Linkage Reports). Although RCDSMM and other commenters provided comments during the PEIR public comment period that addressed mountain lion habitat, and the Santa Ynez Band of Chumash Indians provided two comment letters addressing tribal cultural resources, the 2021 Linkage Report was not known by or made available to DTSC during the public comment process or following the public comment period but prior to certification of the PEIR. The 2023 Linkage Report Update was not published until September 2023, after certification of the PEIR.

Additionally, in 2024, DTSC learned through news media channels that mountain lion movement data collected by GPS collars fitted on mountain lions in the vicinity of SSFL was being collected and might be available from the National Park Service (NPS). Accordingly, DTSC reached out to NPS in June 2024, which informed DTSC that mountain lions had been traversing the Simi Hills between 2018 and 2023, including the SSFL site, to move between the Santa Susana Mountains and the Santa Monica Mountains. In August 2024 communications, NPS also advised DTSC that SSFL represents important, high-quality habitat for mountain lions.

The Certified PEIR addressed the mountain lion in Revised Draft PEIR Section 4.3, Biological Resources, and Section 4.4, Cultural Resources. This Addendum focuses on updating the impact statements contained in those sections, as well as adding an additional mitigation measure specific to mountain lions, to reflect the more recently obtained information relating to the mountain lion.

Crotch's Bumble Bee

An additional biological resource, the Crotch's bumble bee (CBB), was considered as a candidate for listing under the California Endangered Species Act (CESA), or listed as a Special Animal, as of September 2022. The presence of CBB was not known by DTSC at the SSFL site at the time the PEIR was certified in July 2023. Therefore, the CBB was not evaluated in the 2017 Draft PEIR or the 2023 Certified PEIR.

In June 2019, the California Fish and Game Commission (Commission) determined listing under CESA may be warranted for four bumble bee species, including the CBB. However, the Commission's candidacy determination was challenged in court and stayed during the litigation. In May 2022, a California court of appeal upheld the listing, and the California Supreme Court subsequently declined to review the case. Candidacy was thereby reinstated on September 30, 2022. In December 2022, the California Department of Fish and Wildlife (CDFW) issued a notice seeking public comments on a petition to list the CBB under the CESA.

In February 2024, Boeing shared biological resources maps with DTSC and CDFW that identified the presence of CBB in four locations at SSFL. These observations occurred incidentally during an assessment conducted at SSFL in 2019 and 2022 on the response of the Santa Susana tarplant, a rare native species, to the 2018 Woolsey Fire. The CBB was observed in June 2020 and May 2022 during documentation of pollinators. The June 2020 observations were submitted to CDFW's California Natural Diversity Database on September 14, 2020. CDFW had submitted comments on the Draft PEIR but neither CDFW nor other commenters addressed potential impacts on CBB, and DTSC was not notified of the CBB observations in light of the species' reinstated candidacy until after the PEIR was certified.

Therefore, with the addition of the CBB as a CESA candidate species at SSFL, an analysis of potential impacts to the CBB and mitigation measures is provided. The Certified PEIR addressed special-status invertebrates (which would now include CBB per the Addendum) with specific mitigation measures. The Addendum includes an additional mitigation measure specific to the CBB.

Errata

Finally, DTSC identified potential clarifications and corrections needed in the Certified PEIR. These revisions to the Certified PEIR are provided in Chapter 3, Errata, of this document.

CHAPTER 2

Impact Analysis

Introduction to the Analysis and Conclusion

This chapter addresses the biological and cultural resource information that DTSC received since certification of the PEIR, including a discussion of the significance of the information and a comparative analysis with the conclusions in the Certified PEIR. Although the additional information supplements information provided in the Certified PEIR, the conclusions of the analysis in this chapter remain consistent with those made in the Certified PEIR. No new significant impacts will result, and no substantial increase in the severity of impacts will result, based on the additional information made available to DTSC after PEIR certification.

2.1 Biological Resources

Biological resources were evaluated in Revised Draft PEIR Section 4.3 of the Certified PEIR. This section focuses on the Crotch's Bumble Bee (CBB) and mountain lion, as well as wildlife movement and corridors.

2.1.1 Environmental Setting

Vegetation and Land Cover Types

The majority of the SSFL site is undeveloped, consisting mostly of chaparral, coastal sage scrub, rock outcrop, oak woodland, and a variety of native upland and aquatic habitats. Developed areas generally consist of paved and unpaved roads, existing infrastructure, and numerous intact or recently decommissioned former test facility platforms. The vegetation communities and landcover types within SSFL and adjacent offsite areas include: shrublands, foothill woodlands, grasslands, Coast Live Oak Riparian Woodland, and rock outcrop/vegetated.

2.1.2 Special Status Species

Crotch's Bumble Bee

The Certified PEIR evaluated sensitive biological resources, including special-status species in Revised Draft PEIR Section 4.3.1.5. The CBB was a candidate for listing as early as December 2022; however, DTSC was unaware of any CBB observations at SSFL at the time of the PEIR certification in July 2023. Thus, this species was not evaluated in the Certified PEIR.

The CBB occurs primarily in California. Once common throughout its range, the CBB is now absent from much of its former range. It is found between San Diego and Redding in a variety of habitats including open grasslands, shrublands, chaparral, margins of deserts in Joshua tree and creosote scrub, and semi-urban settings. California's Central Valley once served as a primary population center for the species.

The CBB is active from late February to late October. Bumble bee colony success is dependent on suitable foraging, nesting, and overwintering sites. Diverse habitat features increase the likelihood of nesting and overwintering sites. Nests are often located underground, in abandoned rodent nests, or above ground in tufts of grass, old bird nests, rock piles, or cavities in dead trees. Limited information exists regarding overwintering habits of most bumble bee species. However, bumble bee species are generally known to overwinter in small cavities just below or on the ground surface or under leaf litter or other debris.

In June 2020 and May 2022, the CBB was identified in four locations within the SSFL site: (1) Area I (hill above the Upper Parking Lot); (2) Area I (CTL-I); (3) Area I (Lower Canyon); and (4) Area IV (Braunton's Milkvetch Hill). These observations occurred incidentally during an assessment conducted at SSFL between 2019 and 2022 on the response of the Santa Susana tarplant, a rare native species, to the 2018 Woolsey Fire. The CBB has not been observed at SSFL since 2022. Suitable habitat for the CBB occurs at SSFL within the grasslands, shrublands, and vegetated rock outcrop vegetation communities mapped on-site.

Mountain Lion

The mountain lion is one of 15 special-status mammal species documented on the SSFL site that was analyzed in the Certified PEIR. As explained on p. 4.3-64 of the Certified PEIR, mountain lions have one of the largest ranges of any terrestrial animal in north and South America, in part because of their ability to adapt to different habitats. Mountain lions are most abundant in riparian and brushy habitats and primarily prey on deer. Optimal habitat for mountain lions within the project site includes chaparral and coastal sage scrub communities, oak and riparian woodlands, grasslands, and rock outcroppings and formations (NPS, 2024b). Other shrublands and riparian habitats at SSFL provide suitable habitat to support this species. As reflected in Figure 4.3-2 and Figures 4.3-2a through 4.3-2d in the Certified PEIR, the project site largely consists of suitable or optimal habitat for mountain lions.

Adult mountain lions within the Central Coast South population are estimated to number at least five to ten individuals throughout the Santa Monica Mountains, Simi Hills, and Santa Susana Mountains. Mountain lions and their cubs have been observed passing through the SSFL site (DOE, 2018; NPS, 2024b) and the species was documented as present on the site in the Certified PEIR. The Linkage Reports mapped mountain lion

collar data from 2002 to 2013, confirming mountain lion use of SSFL. Additionally, collar data collected by the NPS showed mountain lions' home ranges overlapped SSFL during various periods between 2018 and 2023.

Wildlife Migration and Movement Corridors

As indicated in the Certified PEIR, wildlife movement corridors are generally defined as connections between blocks of habitat that allow for physical movement and genetic exchange between otherwise isolated animal populations. They may be especially critical where human activities would otherwise prohibit or impair the movement of species between habitat areas.

As shown in Figure 4.3-3 of the Certified PEIR, SSFL is located within the eastern strand of the Santa Monica-Sierra Madre Landscape Linkage, which connects the Santa Monica Mountains to the south and the Sierra Madre Ranges of the Los Padres National Forest to the north. This eastern strand of the Santa Monica-Sierra Madre Landscape Linkage includes portions of the north-central Santa Monica Mountains, Simi Hills, Santa Susana Mountains, Santa Clara River Valley and southeastern Sierra Madre Mountains of western Los Angeles and eastern Ventura Counties.

The 2021 Linkage Report focuses on this easternmost strand (East Branch) in assessing the current state of the Santa Monica-Sierra Madre Landscape Linkage. It recognizes the importance of this linkage to the genetic viability of a wide range of diverse species. A main threat to mountain lions' future survival is habitat fragmentation due to freeways and urban sprawl. In the case of the Santa Monica Mountains population of mountain lions, the report states that the linkage is considered essential to their future survival.

The 2021 Linkage Report maps the density of overlapping conservation conditions to show the relative conservation importance of areas within the linkage. It identifies three areas as essential to maintaining and restoring connectivity function within the East Branch, one of which is SSFL. Because SSFL is bound on both the east and west by development, it spans much of the width of the entire area in which linkage connectivity is considered possible. The 2023 Linkage Report also shows that mountain lions are reliant on areas within the East Branch Santa Mounica – Sierra Madre Connection, including areas that are not protected as open space. The NPS (2024b) confirms that the project site provides the best habitat connection for wildlife to the Santa Monica Mountains to the south and the Santa Susana Mountains to the north.

The undeveloped areas of the project site consisting of chaparral and coastal sage scrub communities, oak and riparian woodlands, grasslands, and rock outcroppings and formations, offer optimal, high-quality habitat that is essential for the survival and movement of wildlife.

Overall, the Linkage Reports and NPS data support the fact that the SSFL site represents important, high-quality habitat based on the vegetation types present, the diversity of wildlife detected, the mountain lion home ranges that overlap with the project site, and its importance for connectivity between the Santa Monica Mountains to the south and other natural areas to the north.

2.1.3 Thresholds and Methodology

This analysis evaluates potential impacts to the CBB and mountain lion as well as wildlife movement that could result from the overall cleanup and initial activities based on information that became available to DTSC after certification of the PEIR. The same thresholds and methodology used in the Certified PEIR are used here. Potential adverse impacts to sensitive invertebrate species and mountain lions were evaluated in the Certified PEIR Impact Statements 4.3-2a and 4.3-2b: Sensitive or Special-Status Species. In addition, the mountain lion was also evaluated in Impact Statement 4.3-5a and 4.3-5b: Fish or Wildlife Movement Corridors and Nursery Sites.

2.1.4 Impact Analysis

The impact numbering used below is consistent with that used in the Certified PEIR.

Sensitive or Special-Status Species

Program Assessment

Impact 4.3-2a: Would implementation of the overall site cleanup have a substantial adverse effect either directly or through habitat modification, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or US FWS?

Overall Site Cleanup

Crotch's Bumble Bee

The Certified PEIR evaluated potential impacts to special-status invertebrates with a moderate or high potential to occur within SSFL and determined that given the vast amounts of open space within the Northern and Southern Undeveloped Areas and adjacent lands outside of the site, cleanup activities would not be expected to drop special-status invertebrates' populations below self-sustaining levels. The Certified PEIR concluded that even though the presence and distribution of these species within SSFL is undocumented and unknown, the implementation of Mitigation Measure BIO-6 (Revegetation Plan), Mitigation Measure BIO-9 (Special-Status Invertebrates), and Mitigation Measure BIO-20 (Seed Collection and Cuttings for Habitat Restoration) would reduce potential impacts to these species to less than significant.

Suitable habitat for the CBB occurs within the grasslands, shrublands, and vegetated rock outcrop vegetation communities mapped on-site. This species has been observed at SSFL in fire-recovering coastal sage scrub and chaparral habitats. Cleanup activities could result in the disturbance or removal of up to 231 acres of suitable habitat for the species, including foraging habitat or nest colonies. Implementation of Mitigation Measures BIO-1 (Critical Habitat and Listed Species Avoidance), BIO-6 (Revegetation Plan), BIO-9 (Special-Status Invertebrates), and BIO-20 (Seed Collection and Cuttings for Habitat Restoration) from the Certified PEIR would avoid and minimize impacts to the CBB and its habitat; however, to address the additional information regarding the identification of the CBB on the project site, BIO-24 (Crotch's Bumble Bee) has been developed to further avoid and minimize impacts to the CBB and its habitat and require appropriate authorization and mitigation for any impacts that cannot be avoided. Impacts to the CBB and its habitat would be less than significant with mitigation. This was the same conclusion reached in the Certified PEIR for special-status invertebrates.

Mountain Lion

The Certified PEIR evaluated potential impacts to mountain lions and concluded that with implementation of Mitigation Measure BIO-1 (Critical Habitat and Listed Species Avoidance), Mitigation Measure BIO-6 (Revegetation Plan), and Mitigation Measure BIO-20 (Seed Collection and Cuttings for Habitat Restoration), impacts to mountain lions would be mitigated to less-than-significant levels.

Mountain lions use a variety of habitats including rock outcroppings, canyons, woodlands and forests, but prefer riparian and brushy areas with shrub vegetation. Their preferred habitats have rocky outcrops or dense vegetation from which to ambush prey.

Mountain lions and their cubs have been observed passing through and taking residence at SSFL (DOE, 2018; NPS, 2024b). The majority of cleanup activities would occur in disturbed or developed areas, some of which support, or have the potential to support, mountain lions. As indicated in the Certified PEIR, cleanup activities would avoid rock outcroppings, but loss of habitat for mountain lions would occur in other types of habitats from disturbances to vegetation. In particular, the Certified PEIR determined that impacts to riparian habitat and other sensitive natural communities would be significant and unavoidable. (Impact Statement 4.3-3a.)

However, while a maximum total of approximately 592 acres of the site could be subject to soil remediation (conservatively assuming there are no impacted soils that have been exempt from remediation to preserve biological or cultural resources [Exception Areas]), approximately 2,285 acres (79%) of total habitat at SSFL would remain undisturbed and available for wildlife use, including mountain lions. Of the total 592 acres that could be subject to soil remediation, up to 431 acres is comprised of optimal habitat for mountain

lion use. Approximately 2,209 acres (84%) of optimal mountain lion habitat at SSFL would remain undisturbed and could be used by mountain lions for foraging, dispersal, and breeding. Thus, assuming no Exception Areas, a maximum total of 592 acres (or 21%) of the total habitat on site within the mountain lion home range, including 431 acres (or 16%) of total optimal habitat for mountain lions on site, would be impacted by the project remediation activities.

Native habitats that may be utilized by mountain lions and impacted by the work would be mitigated and replaced in accordance with Mitigation Measure BIO-6 (Revegetation Plan), which would require a site-specific revegetation plan be prepared and approved by DTSC in consultation with CDFW prior to ground disturbance activities occurring in native habitats and/or suitable habitat for sensitive plants or wildlife, including mountain lions; restoration of native vegetation, including suitable habitat for mountain lions; and identification of micro-habitat requirements for sensitive wildlife species such as mountain lions. Mitigation Measure BIO-20 (Seed Collection and Cuttings for Habitat Restoration) would require seed collection and/or cuttings for purposes of habitat restoration.

Regarding potential impacts to mountain lion individuals, as discussed in the Certified PEIR, injury or mortality to mountain lions resulting from proposed remediation activities are not expected, as work would primarily occur during the day, and this species is nocturnal and thus, most active at night. Implementation of Mitigation Measure BIO-22 (Wildlife Movement) would ensure that vital wildlife corridors remain unobstructed for safe passage during the cleanup activities. However, mountain lion individuals could potentially be impacted if denning on the project site. To minimize impacts to mountain lions that may be encountered during cleanup activities, Mitigation Measure BIO-1 (Critical Habitat and Listed Species Avoidance) requires avoidance of state or federally listed species that may be encountered onsite, including mountain lions. Additionally, in light of the information in the Linkage Reports, Mitigation Measure BIO-25 (Mountain Lion Natal Den Survey and Avoidance) has been developed to specifically require avoidance of potential mountain lion dens. To minimize disruption to mountain lion genetic diversity and movement, remediation activities would be strategically staggered across the site in a manner that would allow for wildlife passage between the Simi Hills and the Santa Susana Mountains, and disturbances would be limited to specific work locations that do not span the entire site in accordance with Mitigation Measure BIO-22 (Wildlife Movement). In accordance with BIO-25, the RPs shall conduct surveys within a 2,000-foot buffer of the remediation area to determine whether a mountain lion or mountain lion den are present prior to commencing remediation activities. Thus, impacts to mountain lions and their habitat would be less than significant with mitigation. This was the same conclusion reached in the Certified PEIR.

Impact 4.3-2a Conclusion

With implementation of Mitigation Measures BIO-1 (Critical Habitat and Listed Species Avoidance), BIO-6 (Revegetation Plan), BIO-9 (Special-Status Invertebrates), BIO-20 (Seed Collection and Cuttings for Habitat Restoration), BIO-22 (Wildlife Movement), BIO-24 (Crotch's Bumble Bee), and BIO-25 (Mountain Lion Natal Den Survey and Avoidance), impacts to the CBB and its habitat, and mountain lions and their habitat, would be less than significant. Mitigation Measure BIO-24 specifically addresses the CBB, and Mitigation Measure BIO-25 would provide additional protection to mountain lions that may be denning onsite. Thus, with the implementation of the mitigation measures, no new significant environmental impact or substantial increase in the severity of a previously identified significant environmental impact would occur.

Initial Project Assessment

Impact 4.3-2b: Would implementation of the initial activities have a substantial adverse effect either directly or through habitat modification, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or US FWS?

DOE Area IV Radiological and Contiguous Chemically Contaminated Soil Removal and NASA Liquid Oxygen Plant

The DOE Area IV cleanup (DOE's Initial Project) would result in the excavation of soil that would remove or otherwise disturb approximately 23 acres of habitat including chaparral, Venturan coastal sage scrub, mulefat scrub, coast live oak riparian forest, coast live oak woodland, California walnut woodland, grassland, and disturbed and developed areas. Affected soils would be excavated and the excavated areas would be backfilled and restored by grading and reseeding.

The cleanup of the NASA Liquid Oxygen Plant (NASA's Initial Project) would result in the excavation of soil that would remove or otherwise disturb approximately 16 acres of habitat including coast live oak woodland, coast live oak woodland (riparian), mulefat scrub, chaparral, Venturan coastal sage scrub, and disturbed and developed areas. The excavated areas will be backfilled and restored by grading and reseeding.

Crotch's Bumble Bee

DOE's Initial Project and NASA's Initial Project could result in the disturbance or removal of vegetation that is suitable or occupied by the CBB, particularly chaparral and Venturan coastal sage scrub. As the Certified PEIR concluded, implementation of BIO-6 (Revegetation Plan), BIO-9 (Special-Status Invertebrates), and Mitigation Measure BIO-20 (Seed Collection and Cuttings for Habitat Restoration), would require

restoration of suitable habitat, seed collection/cuttings, and preconstruction capture and release surveys with appropriate permits if special-status invertebrates, such as the CBB, are detected. Additionally, implementation of Mitigation Measure BIO-1 (Critical Habitat and Listed Species Avoidance) and BIO-24 (Crotch's Bumble Bee) would avoid and minimize impacts to the CBB and its habitat and require appropriate authorization and mitigation for any impacts that cannot be avoided. Thus, impacts to the CBB and its habitat would be less than significant with mitigation. This was the same conclusion reached in the Certified PEIR for invertebrate species.

Mountain Lion

Potential impacts to mountain lion habitat could occur due to habitat loss from ground disturbing activities during DOE's Initial Project and NASA's Initial Project. As with the overall site cleanup, DOE and NASA Initial Project remediation activities would avoid rock outcroppings, but loss of habitat for mountain lion could occur in other types of habitats from disturbances to vegetation. As the Certified PEIR concluded, such impacts to habitat would be mitigated with implementation of Mitigation Measure BIO-6 (Revegetation Plan), which would require restoration of native vegetation, including suitable habitat for mountain lion, and Mitigation Measure BIO-20 (Seed Collection and Cuttings for Habitat Restoration), which would require seed collection and/or cuttings for purposes of habitat restoration.

Injury or mortality to mountain lions resulting from proposed cleanup activities are not expected, as work would primarily occur during the day, and this species is nocturnal and thus, most active at night. However, mountain lion individuals could potentially be impacted if denning on the project site. Mitigation Measure BIO-1 (Critical Habitat and Listed Species Avoidance) requires avoidance of state or federally listed species that may be encountered onsite, and Mitigation Measure BIO-25 (Mountain Lion Natal Den Survey and Avoidance) requires avoidance of potential mountain lion dens. With implementation of BIO-1 (Critical Habitat and Listed Species Avoidance), BIO-6 (Revegetation Plan), BIO-20 (Seed Collection and Cuttings for Habitat Restoration), and BIO-25 (Mountain Lion Natal Den Survey and Avoidance), impacts would be mitigated to less-than-significant levels. This was the same conclusion reached in the Certified PEIR.

Demolition Activities; RCRA Post-Closure and Hazardous Waste Facility Closure; and Areas I, II, and III Impoundment Post-Closure

Demolition activities in Area IV, cleanup activities related to the RCRA Post-Closure and Hazardous Waste Facility Closure, and cleanup and operational activities associated with the Areas I, II, and III Impoundment Post-Closure, would all occur within existing developed or disturbed areas, most of which do not support any vegetation and likewise do not provide habitat for special-status wildlife, including mountain lions and the CBB.

Therefore, these initial activities would not have a substantial adverse effect, either directly or through habitat modification, on mountain lions or their habitat or the CBB or its habitat. This was the same conclusion reached in the Certified PEIR for invertebrate species.

Bedrock Removal for Strontium-90

Bedrock removal for Strontium-90 would occur in Area IV near the former Radioactive Materials Handling Facility leach field within currently developed areas that do not support any vegetation and likewise do not provide habitat for special-status wildlife. Areas surrounding the bedrock removal areas include chaparral habitat and vegetated rock outcrops that can support special-status species. Bedrock could potentially be blasted into these surrounding areas, which could potentially result in injury or mortality to special-status or other terrestrial wildlife.

Crotch's Bumble Bee

Although bedrock removal would occur in developed areas that do not provide habitat for the CBB, the surrounding areas could contain grasslands, shrublands, and vegetated rock outcrop that can support the CBB. In surrounding areas that could contain suitable habitat for the CBB, implementation of BIO-1 and BIO-24 would avoid and minimize impacts to the CBB and habitat and require authorization and mitigation for any unavoidable impacts. Impacts to the CBB and its habitat would be less than significant with mitigation. This was the same conclusion reached in the Certified PEIR for invertebrate species.

Mountain Lion

Although bedrock removal would occur in developed areas that do not provide habitat for mountain lions, the surrounding areas include chaparral habitat and vegetated rock outcrops that can support mountain lions. The potential for bedrock to be blasted to these adjacent habitats could result in injury or mortality to terrestrial wildlife. Implementation of mitigation measures, including Mitigation Measure BIO-2 (Worker Environmental Awareness Program Training) and BIO-12 (Wildlife Monitoring) would require worker environmental awareness training and wildlife monitoring to minimize potential impacts to terrestrial wildlife that would be encountered, and Mitigation Measure BIO-22 (Wildlife Movement) would allow for wildlife to passively leave the work area and affected blasting area before work may resume and BIO-25 (Mountain Lion Natal Den Survey and Avoidance) would require surveys be conducted prior to commencing work activities. Therefore, impacts would be mitigated to less-than-significant levels, as concluded in the Certified PEIR. This was the same conclusion reached in the Certified PEIR.

Impact 4.3-2b Conclusion

With implementation of Mitigation Measures BIO-1 (Critical Habitat and Listed Species Avoidance), BIO-6 (Revegetation Plan), BIO-9 (Special-Status Invertebrates), BIO-20 (Seed Collection and Cuttings for Habitat Restoration), BIO-22 (Wildlife Movement), BIO-24 (Crotch's Bumble Bee), and BIO-25 (Mountain Lion Natal Den Survey and Avoidance), impacts resulting from the initial activities to the CBB and its habitat and mountain lions and their habitat would be less than significant. Thus, with the implementation of the mitigation measures, no new significant environmental impact or substantial increase in the severity of a previously identified significant environmental impact would occur.

2.1.5 Wildlife Movement Corridors and Nursery Sites

Program Assessment

Impact 4.3-5a: Would the overall site cleanup interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Overall Site Cleanup

SSFL is located within the eastern strand of the Santa Monica-Sierra Madre Landscape Linkage, as discussed in detail above, and provides local and regional opportunities for wildlife including mountain lions to reside, forage, disperse, and migrate between habitats.

The Certified PEIR analyzed long-term impacts to terrestrial wildlife and wildlife movement that would occur as a result of roadkill associated with the substantial increase in traffic on local roads to and from SSFL, as well as within the proposed cleanup areas. Mitigation Measures BIO-12 (Wildlife Monitoring) and BIO-22 (Wildlife Movement) provide measures to minimize direct impacts on special-status wildlife species, including mountain lions, during soil and groundwater cleanup activities.

Mitigation Measure BIO-12 (Wildlife Monitoring) requires a USFWS- and CDFW approved biologist to conduct wildlife monitoring prior to and during ground disturbance to avoid and minimize harm to special-status wildlife encountered. It also requires work to halt if special-status wildlife are encountered until the biologist determines appropriate actions to avoid and minimize harm to the species. Thus, Mitigation Measure BIO-12 (Wildlife Monitoring) would minimize mortality of migrating animals during soil and groundwater cleanup activities.

Mitigation Measure BIO-22 (Wildlife Movement) requires cleanup activities to be staggered across the site, limiting disturbances to specific locations that do not span the

entire site, to provide refuge for wildlife that may use the site as a corridor. In addition, work areas would not block or restrict access to all open space areas used for wildlife movement, as approximately 2,394 acres of land on the project site and adjacent areas would remain undisturbed for wildlife use and movement. Further, cleanup activities would primarily occur during the day when most wildlife are less active to minimize disruption to wildlife utilizing the corridor. If nighttime remediation is required, all lighting shall be broadcast away from any wildlife movement areas to the greatest extent practicable. Therefore, with implementation of mitigation measures, potential impacts would be reduced to less than significant, as concluded in the Certified PEIR.

Impact 4.3-5a Conclusion

With implementation of Mitigation Measures BIO-12 (Wildlife Monitoring) and BIO-22 (Wildlife Movement), impacts regarding wildlife movement corridors would be less than significant. Thus, with the implementation of the mitigation measures, no new significant environmental impact or substantial increase in the severity of a previously identified significant environmental impact would occur.

Initial Project Assessment

Impact 4.3-5b: Would the initial activities interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

DOE Area IV Radiological and Contiguous Chemically Contaminated Soil Removal; NASA Liquid Oxygen Plant; DOE and Boeing Area IV Demolition Activities; Areas I, II, and III Impoundment Post-Closure; and RCRA Post-Closure and Hazardous Waste Facility Closure

Potential project impacts to native wildlife movement, migratory wildlife corridors, and the use of native wildlife nursery sites in DOE's Initial Project area, NASA's Initial Project area, and the initial activities associated with the RCRA Post-Closure and Hazardous Waste Facility Closure would be like those previously described for the overall site cleanup. Given SSFL's importance for connectivity within the East Branch of the Santa Monica-Sierra Madre Landscape Linkage and the NPS collar data that indicates mountain lions' home ranges overlap with SSFL, DOE's Initial Project, NASA's Initial Project, Area IV demolition activities, and impoundment post-closure maintenance activities and soil contamination removal could disrupt terrestrial wildlife movement, including that of mountain lions, and result in potentially significant impacts to migratory wildlife corridors. With the implementation of Mitigation Measure BIO-2 (Worker Environmental Awareness Program Training), Mitigation Measure BIO-22 (Wildlife

Movement) and Mitigation Measure BIO-12 (Wildlife Monitoring), potential impacts would be reduced to less-than-significant levels.

Bedrock Removal for Strontium-90

Noise and debris from blasting activities could hinder wildlife movement, including that of mountain lions. Mitigation Measure BIO-2 (Worker Environmental Awareness Program Training) requires implementation of worker environmental training. Measure BIO-12 (Wildlife Monitoring) requires a USFWS- and CDFW-approved biologist to conduct wildlife monitoring prior to all initial ground disturbing activities and for any work within 100 feet of native habitats. Mitigation Measure BIO-22 (Wildlife Movement) would minimize potential impacts to terrestrial wildlife should they move into the work area by temporarily halting work and avoiding harm to the species. With the implementation of these mitigation measures, impacts to wildlife movement, as it relates to mountain lions, would be reduced to less than significant.

Impact 4.3-5b Conclusion

With implementation of Mitigation Measures BIO-2 (Worker Environmental Awareness Program Training), BIO-12 (Wildlife Monitoring), and BIO-22 (Wildlife Movement), impacts to wildlife movement resulting from the initial activities would be less than significant. Thus, no new significant environmental impact or substantial increase in the severity of a previously identified significant environmental impact would occur.

2.1.6 Mitigation Measures

The following mitigation measures would apply to the CBB, mountain lions, and wildlife movement. Revisions made to the Certified PEIR are shown in double underline. The full text of new or revised mitigation measures is included here in this Addendum. For mitigation measures that have not been revised, their full text can be found in Chapter 4.3.6 of the Certified PEIR.

BIO-1: Critical Habitat and Listed Species Avoidance.

BIO-2: Worker Environmental Awareness Program Training.

BIO-6: Revegetation Plan.

BIO-9: Special-Status Invertebrates.

BIO-12: Wildlife Monitoring.

BIO-19: Sensitive Habitats.

BIO-20: Seed Collection and Cuttings for Habitat Restoration.

BIO-22: Wildlife Movement. To minimize potential impacts to terrestrial wildlife species and wildlife movement, the following measures shall be implemented:

a. The cleanup activities shall be staggered across the site, limiting disturbances to specific locations that do not span the entire site, to provide refuge for wildlife that may use the site as a corridor. Staggering of cleanup activities shall be coordinated in consultation with CDFW and/or NPS to ensure wildlife movement is not obstructed during cleanup activities. A buffer zone with minimal cleanup activity between active work areas and the corridor shall be maintained to provide temporary refuge habitat for wildlife during cleanup, particularly overnight when species are likely to be migrating.

b. To the greatest extent possible, disruptive cleanup activities (e.g., blasting) shall be scheduled outside of sensitive wildlife breeding, nesting, or birthing seasons for species potentially using the corridor. While the target timeframe for blasting activities is September 16 – December 31, surveys will be required prior to the start of activities regardless of when they are scheduled to occur.

c. If any terrestrial wildlife species that have entered the work area and could be harmed by work activities are encountered during biological monitoring or by construction workers, work shall halt in that work area until a qualified biologist, retained by the RPs, under the direction of DTSC, determines appropriate actions to avoid harm to the species. Wildlife shall be allowed to leave the work area before work may resume, or a qualified biologist may relocate non-listed species to areas of suitable habitat that would not be disturbed.

d. Nighttime work shall be avoided as much as possible. If nighttime remediation is necessary, all lighting shall be broadcast away from any wildlife movement areas, including areas that support wildlife movement such as ephemeral drainages and closed tree canopies, to the greatest extent practical. Any nighttime lighting shall be shielded downward as to avoid light spillage into the adjacent wildlife corridor to the south.

e. To the extent practicable, truck travel on access roads and within cleanup areas should avoid dawn and dusk when wildlife activity is high.

f. During rain events, work shall not occur within 50 feet of aquatic habitats or within a suitable buffer as determined by a qualified biologist.

g. Speeds shall be limited to 25 mph or less within the proposed remediation areas and along access roads.

BIO-24: Crotch's Bumble Bee

For remediation areas that have suitable foraging or nesting habitat for the Crotch's Bumble Bee (CBB), a CDFW-approved biologist shall conduct protocol surveys to determine presence/absence. If the CBB will be captured or handled, a Scientific Collecting Permit (SCP) from CDFW must be obtained by the CDFW approved biologist. In addition to protocol surveys, if the CBB will not be captured or handled, the CDFW-approved biologist could photograph the bees for identification purposes and may use the assistance of a taxonomist to confirm the species.

A minimum of three surveys shall be conducted during peak flying season when the species is most likely to be detected above ground, between April and August, during the colony active period (Thorp et al., 1983; CDFW, 2023). The CDFW-approved biologist shall utilize a non-lethal survey methodology and obtain appropriate photo vouchers for species confirmation (CBBA, 2023). During the surveys, the CDFW-approved biologist shall flag inactive small mammal burrows and other potential nest sites to reduce the risk of take. Survey results, including negative findings, shall be submitted to CDFW prior to obtaining appropriate permits. At minimum, a survey report shall provide the following:

a. A description and map of the survey area, focusing on areas that could provide suitable habitat for the CBB. CDFW recommends the map show surveyor(s) track lines to document that the entire site was covered during field surveys.

b. Field survey conditions that include name(s) of the CDFW-approved biologist and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched.

c. Map(s) showing the location of nests/colonies.

d. A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, shall include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).

If the CBB is detected, the CDFW-approved biologist shall identify the location of all nests within and adjacent to the project site. A 15-meter (~ 50 feet) no

disturbance buffer zone shall be established around any identified nest(s) to reduce the risk of disturbance or accidental take. The CDFW-approved biologist shall expand the buffer zone as necessary to prevent disturbance or take. These no disturbance buffer zones could be considered AOC exception areas and avoided.

If the CBB is detected and impacts to it cannot be feasibly avoided, RPs shall consult with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). Appropriate authorization from CDFW under CESA may include an Incidental Take Permit (ITP), among other options [Fish & Game Code, § 2081, subds. (b) and (c)].

Any suitable habitat associated with the CBB that would be removed or damaged by individual projects shall be replaced at no less than 1:1. Suitable habitat shall be replaced as close to its original location as is feasible. If active CBB nests have been identified and suitable habitat cannot be replaced within 200 meters (~ 600 feet) of their original location, suitable habitat shall be planted in the most centrally available location relative to identified nests. This location shall be no more than 1.5 kilometers (~ 4,900 feet) from any identified nest. Replaced suitable habitat may be split into multiple patches to meet distance requirements for multiple nests. These suitable habitats shall be maintained in perpetuity and replanted and managed as needed to ensure the habitat is preserved.

BIO-25: Mountain Lion Natal Den Survey and Avoidance. Within one year prior to implementation of a cleanup activity, a CDFW-approved biologist knowledgeable of mountain lion species ecology shall survey and map the areas within the remediation footprint and a surrounding survey buffer that may provide potential natal den habitat (i.e., caves, other natural cavities, thickets in brush and timber for cover and denning).

If potential natal dens are identified during surveys, remote, no-glow infrared wildlife cameras shall be installed outside the den area to determine occupancy. Wildlife cameras shall be set up for one week prior to remediation activities or as determined appropriate by the qualified biologist to document natal den occupancy. Survey results from the remote wildlife cameras, including negative findings, shall be submitted to CDFW.

If occupied natal dens are identified, no work shall occur within a 2,000-foot buffer from a natal den, unless a qualified biologist consults with CDFW to determine the appropriate course of action, including any buffer modification, in order to not adversely affect the successful rearing of the cubs. No remediation activities or human intrusion shall occur within the established setback until the cubs have been successfully reared or the cats have left the area.

No rodenticides or second-generation anticoagulant rodenticides shall be permitted for use during project activities.

2.2 Tribal Cultural Resources

2.2.1 Background

Tribal cultural resources were evaluated in Revised Draft PEIR Section 4.4 of the Certified PEIR. Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe. Tribal cultural resources may include ethnographic resources such as places and elements of the natural landscape of cultural importance to Native Americans, sacred sites, archaeological resources, rock art, and prominent topographical areas, features, habitats, plants, animals, and minerals that contemporary Native Americans value and consider essential for the preservation of their traditional values.

Such resources may also constitute a Traditional Cultural Property (TCP) or cultural landscape. The NPS defines a TCP as “one that is eligible for inclusion in the National Register [of Historic Places] because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history, and (b) are important in maintaining the continuing cultural identity of the community” (NPS, 1998:1). TCPs can embrace a wide range of historic properties, such as the location associated with a Native American group’s origin, the group’s beliefs or understanding regarding the origin of the world (cosmogony), or an urban neighborhood that is the traditional home of a particular cultural group and that still reflects and is associated with their beliefs and practices. Physical characteristics (contributing elements) of a TCP that appear to convey its historical significance include prehistoric and multicomponent archaeological sites and isolates, prehistoric rock art, topographic features (including mountain peaks and rock outcroppings), plants (particularly indigenous plants of traditional cultural significance), and animals.

As indicated in the Certified PEIR, DTSC, in its discretion and in accordance with Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5(a)(4), determined that the entire 2,850-acre SSFL site is a TCP (SSFL TCP) eligible for inclusion in the California Register of Historical Resources (CRHR) for the purposes of this project. Accordingly, the entire site is considered a tribal cultural resource as defined by Public Resources Code Section 21074(a)(1)(A).

As indicated above, after the PEIR was certified, DTSC received two reports highlighting the importance of SSFL in maintaining habitat connectivity for the mountain lion given its cultural significance to tribes. While the Certified PEIR addressed the tribal importance of plants and animals at the site, the following provides additional

information related to the mountain lion and its importance to tribes based on the Linkage Reports.

2.2.2 Environmental Setting

As discussed in the Certified PEIR, the area around SSFL, known as “Sky Valley;” was a place where the territories of three tribes, the Chumash, Tataviam, and Tongva/Gabrielino (some Gabrielino prefer the term “Kizh”), intersected. As the Linkage Reports note, these tribes converged over thousands of years “in the area of the East Branch, SSFL site, and surrounding lands, solidifying cultural and spiritual connections to the natural features and the plants and animals that have long used the area.” Mountain lions have significant cultural value to these tribes because “they are intrinsically part of, and belong to, the land, and are integral to maintaining its function and health” (2023 Linkage Report Update). For example, Chumash text and oral traditions evidence the significance of mountain lions within their community, with the animal appearing in cosmology narratives describing the beginning of the Chumash universe (2023 Linkage Report Update). The 2023 Linkage Report Update also notes that “[m]ountain lion sacrality appears in original texts from neighboring tribes too.”

Tribal Cultural Resources and Traditional Cultural Properties Located within the SSFL Site

As discussed above, the SSFL TCP has traditional religious and cultural significance to several local tribes including the Chumash, Tongva/Gabrielino (including the Kizh Nation), and the Tataviam. Inventories of native plant and animal species have indicated that there are many plant and animal species located within the SSFL TCP that were traditionally important to Native American communities. Thus, these plants and animals, as they exist today, form an integral part of the SSFL TCP as contributing elements that conveys its historical significance.

Relevant here, mountain lions played an important role in the lifeways of Native Americans in the past that continues today. Contemporary Native Americans value mountain lions and consider them essential for the preservation of their traditional values. As a result, mountain lions form an integral part of the SSFL TCP as a contributing element that conveys its historical significance.

2.2.3 Thresholds and Methodology

The same thresholds used in the Certified PEIR are used in this analysis. Plants and animals were evaluated in the Certified PEIR Impact Statement 4.4.5.2, Native American Resources (SSFL TCP). Analysis of impacts on tribal cultural resources was based on consideration of the nature and scope of project activities, the location of known tribal cultural resources, the potential for the inadvertent discovery of unknown tribal cultural resources, and the results of studies described in the Certified PEIR.

Ground-disturbing remediation activities associated with the project could directly impact tribal cultural resources by damaging and displacing artifacts, removing or altering natural habitat, diminishing site integrity, and altering the characteristics that make the resources significant both individually and as contributors. In addition, impacts can occur to the setting (or surroundings) of a tribal cultural resource even if the resource is not directly damaged. Indirect effects are caused by the action and are later in time or farther removed in distance. Indirect effects to tribal cultural resources could include visual, auditory, and atmospheric effects, as well as disturbances to resources caused by erosion or by an increased number of visitors to the site (i.e., construction workers and long-term employees).

2.2.4 Impact Analysis

The following analysis describes the potential environmental impacts related to tribal cultural resources associated with implementing the overall site cleanup and initial activities, identified as impact “a” and “b” respectively. The impact numbering used below is consistent with that used in the Certified PEIR. Each impact discussion concludes with a significance determination. Only mitigation measures that apply to avoiding, minimizing, and/or mitigating impacts to mountain lions, mountain lion habitat, and movement of mountain lions, with respect to tribal cultural resources, are included in the analysis.

2.2.5 Overall Site Cleanup

Impact 4.4-2a: Would implementation of the overall site cleanup cause a substantial adverse change in the significance of a tribal cultural resource as a result of the physical destruction and alteration to the characteristics of the property that convey its significance and qualify it for inclusion in the CRHR as defined in Public Resources Code Section 21074?

Impact Analysis

The SSFL TCP is a tribal cultural resource as defined by Public Resources Code Section 21074(a)(1)(A). Impacts to contributing elements of the SSFL TCP that appear to convey its significance could result in significant impacts to the SSFL TCP.

As discussed in the Certified PEIR Section 4.3, Biological Resources, the project would involve extensive excavation and vegetation removal and would destroy many acres of natural habitat. This habitat loss would impact vegetation and wildlife, such as mountain lions, that are integrally tied to the importance of the SSFL TCP and its natural setting.

Thus, excavation, remediation, and blasting/removal would directly impact contributing elements of the SSFL TCP, such as animals like mountain lions, through the alteration or destruction of, for example, natural habitat.

Although excavated areas would be partially backfilled and restored, the relationship of natural topography, native habitat, and other contributors within the SSFL TCP would not be returned to their pre-project condition and the appearance of the SSFL TCP would be permanently altered.

Although application of Exception Areas would avoid or reduce impacts to the SSFL TCP, for purposes of making a CEQA significance determination, this analysis assumes none have been applied. Implementation of Mitigation Measures CUL-2 (Cultural Resources Management Plan), CUL-3 (Worker Cultural Resources Sensitivity Program), CUL-11 (Native American Document Review and Comment), CUL-12 (Native American Access), CUL-13 (Native American Communication), CUL-14 (Comprehensive Ethnographic Study), CUL-15 (Rock Art Recordation and Interpretation), and CUL-16 (Research Grant for Future Cultural Resources Studies), in conjunction with CUL-1 (Cultural Resources Personnel Professional Qualifications Standard) through CUL-10 (Burro Flats Site Complex Documentation and National Register Nomination) as well as Mitigation Measures BIO-1 (Critical Habitat and Listed Species Avoidance), BIO-2 (Worker Environmental Awareness Training), BIO-6 (Revegetation Plan), BIO-12 (Wildlife Monitoring), BIO-19 (Sensitive Habitats), BIO-22 (Wildlife Movement), and BIO-25 (Mountain Lion Den Survey and Avoidance) would avoid, minimize, rectify, reduce, or compensate for the impact of the overall site cleanup. Additionally, detail has been added to Mitigation Measures CUL-2, CUL-3, and CUL-14 to specifically ensure that the role of mountain lions is considered in the research design for the Cultural Resources Management Plan, in the worker cultural resources sensitivity program, and in the comprehensive ethnographic study, respectively. These details have been added for additional consideration of the mountain lion as a tribal cultural resource as requested by the Tribes in an October 2023 email to DTSC. Although these measures would avoid, minimize, rectify, reduce, or compensate for the impact of the overall site cleanup, they would not mitigate the impact to the SSFL TCP to a less-than-significant level. Therefore, as concluded in the Certified PEIR, impacts to the tribal cultural resource identified as the SSFL TCP would be significant and unavoidable.

Impact 4.4-2a Conclusion

As concluded in the Certified PEIR, even with implementation of Mitigation Measures CUL-1 (Cultural Resources Personnel Professional Qualifications Standard) through CUL-16 (Research Grant for Future Cultural Resources Studies), as modified in this Addendum, in conjunction with Mitigation Measures BIO-2 (Worker Environmental

Awareness Training), BIO-6 (Revegetation Plan), BIO-12 (Wildlife Monitoring), and BIO-19 (Sensitive Habitats), as well as the addition of Mitigation Measure BIO-25 (Mountain Lion Den Survey and Avoidance), impacts to the tribal cultural resource identified as the SSFL TCP would be significant and unavoidable. No new significant environmental impact or substantial increase in the severity of a previously identified significant environmental impact is identified.

Initial Project Assessment

Impact 4.4-2b: Would implementation of the initial activities cause a substantial adverse change in the significance of tribal cultural resources as a result of the physical destruction and alteration to the characteristics of the property that convey its significance and qualify it for inclusion in the CRHR as defined in Public Resources Code Section 21074?

DOE Area IV Radiological and Contiguous Chemically Contaminated Soil Removal and Bedrock Blasting/Removal for Strontium-90

DOE's initial excavation and soil removal, as well as bedrock blasting/removal, would disturb approximately 23 acres of habitat including that of mountain lions. These initial activities would significantly alter the historical setting and interrelationships of contributors to the SSFL TCP. The SSFL TCP is a non-renewable resource and possesses significant intrinsic value to local Native American groups. While implementation of Mitigation Measures CUL-1 (Cultural Resources Personnel Professional Qualifications Standard) through CUL-9 (Comprehensive District Study and National Register Nomination), CUL-11 (Native American Document Review and Comment) through CUL-16 (Research Grant for Future Cultural Resources Studies), as modified in this Addendum, as well as BIO-2 (Worker Environmental Awareness Program Training), BIO-6 (Revegetation Plan), BIO-12 (Wildlife Monitoring), and BIO-19 (Sensitive Habitats) would reduce impacts to the SSFL TCP, as the Certified PEIR concluded, impacts to the tribal cultural resource identified would be significant and unavoidable. This was the same conclusion reached in the Certified PEIR.

NASA Liquid Oxygen Plant

NASA's Initial Project would result in the excavation of soil that would remove or otherwise disturb approximately 14 acres of habitat, including that of mountain lions. These initial activities would significantly alter the historical setting and interrelationships of contributors of the SSFL TCP. While implementation of Mitigation Measures CUL-1 (Cultural Resources Personnel Professional Qualifications Standard) through CUL-16 (Research Grant for Future Cultural Resources Studies), as modified in this Addendum, as well as BIO-2 (Worker Environmental Awareness Program Training), BIO-6

(Revegetation Plan), BIO-12 (Wildlife Monitoring), and BIO-19 (Sensitive Habitats) would reduce impacts to the SSFL TCP, as the Certified PEIR concluded, impacts to the tribal cultural resource would be significant and unavoidable. This was the same conclusion reached in the Certified PEIR.

DOE and Boeing Area IV Building Demolition Activities

Although limited, DOE and Boeing Area IV building demolition activities could incidentally involve the removal and disruption of soils not previously disturbed. While no known archaeological resources, rock art, or natural habitat would be directly impacted by these initial projects, unknown archaeological resources could be inadvertently disturbed and thereby directly impacted during project implementation. Such unknown archaeological resources could be contributing elements of the SSFL TCP and their disturbance could alter the interrelationships of contributing elements to one another and diminish the overall natural setting, feeling, and associations of the SSFL TCP. Thus, direct impacts to unknown archaeological resources that are contributing elements of the SSFL TCP could constitute a significant impact to the SSFL TCP.

While implementation of Mitigation Measures CUL-1 (Cultural Resources Personnel Professional Qualifications Standard) through CUL-9 (Comprehensive District Study and National Register Nomination) and CUL-11 (Native American Document Review and Comment) through CUL-16 (Research Grant for Future Cultural Resources Studies) would reduce impacts to the SSFL TCP, because unknown archaeological resources may be irreversibly impacted during any discoveries associated with the project, mitigation measures would not reduce impacts to a less-than-significant level. Therefore, as concluded in the Certified PEIR, impacts to the tribal cultural resource identified as the SSFL TCP would be significant and unavoidable.

RCRA Post-Closure and Hazardous Waste Facility Closure

Thermal Treatment Facility Closure and Radioactive Materials Handling Facility Closure and Hazardous Waste Management Facility Closure

Although limited, closure activities could incidentally involve the removal and disruption of soils not previously disturbed. While no known archaeological resources, rock art, or natural habitat would be directly impacted by this initial project, unknown archaeological resources could be inadvertently disturbed and thereby directly impacted during project implementation. Such unknown archaeological resources could be contributing elements of the SSFL TCP and their disturbance could alter the interrelationships of contributing elements to one another and diminish the overall natural setting, feeling, and associations of the SSFL TCP. Thus, direct impacts to unknown archaeological

resources that are contributing elements of the SSFL TCP could constitute a significant impact to the SSFL TCP.

While implementation of Mitigation Measures CUL-1 (Cultural Resources Personnel Professional Qualifications Standard) through CUL-9 (Comprehensive District Study and National Register Nomination) and CUL-11 (Native American Document Review and Comment) through CUL-16 (Research Grant for Future Cultural Resources Studies) would reduce impacts to the SSFL TCP, because unknown archaeological resources may be irreversibly impacted during any discoveries associated with the project, mitigation measures would not reduce impacts to a less-than-significant level. Therefore, as concluded in the Certified PEIR, impacts to the tribal cultural resource identified as the SSFL TCP would be significant and unavoidable.

Areas I, II, and III Impoundment Post-Closure

As discussed in the Certified PEIR, archaeological site CA-VEN-1471 in Area III, which is a contributor to the SSFL TCP, overlaps with two impoundments subject to post closure. Because proposed remediation activities would be conducted within the previously disturbed impoundments and no new ground-disturbing activities are proposed, the site would not be directly impacted nor would there be potential for unknown archaeological resources to be disturbed. Rock art and natural habitat would not be impacted. Based on these Certified PEIR findings, and despite the significance of mountain lions to the SSFL TCP, the proposed remediation activities would not alter the interrelationships of contributing elements to the SSFL TCP and would not diminish the overall natural setting, feeling, and associations of the SSFL TCP. Mitigation Measures CUL-1 (Cultural Resources Personnel Professional Qualifications Standard) through CUL-5 (Archaeological and Native American Monitoring), as modified by this Addendum, CUL-7 (Curation of Project Materials), and CUL-8 (Annual Site Condition Verification) would ensure that CA-VEN-1471 is not impacted by this initial project and impacts to the SSFL TCP would be less than significant, as concluded in the Certified PEIR.

Impact 4.4-2b Conclusion

Implementation of Mitigation Measures CUL-1 (Cultural Resources Personnel Professional Qualifications Standard) through CUL-16 (Research Grant for Future Cultural Resources Studies]), as modified by this Addendum, as well as BIO-2 [Worker Environmental Awareness Program Training), BIO-6 (Revegetation Plan), BIO-12 (Wildlife Monitoring), and BIO-19 (Sensitive Habitats), as well as BIO-25 (Mountain Lion Den Survey and Avoidance), would avoid, minimize, rectify, reduce, or compensate for impacts from the initial activities to the SSFL TCP. However, even with implementation of these mitigation measures, as concluded in the Certified PEIR, impacts to the tribal cultural resource identified as the SSFL TCP would be significant and unavoidable.

No new significant environmental impact or substantial increase in the severity of a previously identified significant environmental impact is identified.

2.2.6 Mitigation Measures

The following measures would apply to tribal cultural resources, particularly to mountain lions, mountain lion habitat, and their movement. Revisions to the mitigation measures are shown in double underline. Only mitigation measures that have been revised or added are included in this Addendum in full. For the complete text of the other mitigation measures, please refer to Chapter 4.3.6 of the Certified PEIR for biological resource mitigation measures and Chapter 4.4.6 for cultural resource mitigation measures. (For the complete text of the revised and added biological resources mitigation measures, see Biological Resources, Mitigation Measures section, above.)

BIO-1: Critical Habitat and Listed Species Avoidance

BIO-2: Worker Environmental Awareness Program Training

BIO-6: Revegetation Plan

BIO-12: Wildlife Monitoring

BIO-19: Sensitive Habitats

BIO-22: Wildlife Movement

BIO-25: Mountain Lion Den Survey and Avoidance

CUL-1: Cultural Resources Personnel Professional Qualifications Standard.

CUL-2: Cultural Resources Management Plan. Prior to the start of cleanup activities, an S O I-qualified archaeologist shall be retained by each RP, and shall be subject to DTSC approval, to prepare a Cultural Resources Management Plan (CRMP) for their administrative area, which shall be submitted to DTSC for review and approval prior to the start of any ground-disturbing activities. Upon approval of DTSC, NASA may submit their CR MP to satisfy the requirements of this measure, provided it meets the requirements of this mitigation measure. The purposes of the CRMPs are to document the actions and procedures to be followed to ensure avoidance or minimization of impacts to cultural resources consistent with CEQA Guidelines Section 15126.4(b), and to lay out a detailed program of mitigation for direct and indirect impacts on cultural resources during project implementation. The CRMPs shall cover all project activities across each RPs administrative area and for the life of the project.

The CRMPs shall include, but are not limited to, the following elements and shall be consistent with all mitigation measures contained in this document:

a. A description of the roles and responsibilities of cultural resources personnel, and the reporting relationships between project construction management and the mitigation and monitoring team, including lines of communication and notification procedures.

b. Contact list for project personnel and provisions for regular contact list updates.

c. Specific measures to be taken to avoid impacts to significant cultural resources, such as the designation of Environmentally Sensitive Areas, consistent with Mitigation Measure CUL-4 (Avoidance and Preservation in Place).

d. An archaeological and Native American monitoring plan to be employed through the life of the project, including protocols to be followed during routine monitoring and during discovery situations; roles of archaeological and Native American monitors; agency communication requirements; and reporting requirements (consistent with Mitigation Measure CUL-5 [Archaeological and Native American Monitoring]).

e. High-resolution maps for use by construction personnel to identify locations where archaeological monitoring is required, based on the Santa Susana Field Laboratory Geoarchaeological Assessment (Lockwood, 2016).

f. Native American participation in all cultural-resources-related actions consistent with Mitigation Measures CUL-11 through CUL-13.

g. A Research Design to be used to guide the evaluation of cultural resources, including a regional cultural setting, appropriate regional research questions (including questions that incorporate the role that mountain lions have in Native American lifeways and their interrelationship with other contributing elements of the SSFL TCP), and field methods for the testing and evaluation of cultural resources.

h. Prescribed actions to be taken in the event that cultural resources are inadvertently discovered during remediation, or known resources are impacted in an unanticipated manner, consistent with Mitigation Measure CUL-6 (Inadvertent Discovery), including, but not limited to:

    - Establishment of an Environmentally Sensitive Area, marked with exclusion fencing, with a minimum of a 100-foot radius unless a

smaller buffer is agreed to among the S O I-qualified archaeologist, Interested Tribes, and relevant RP, and upon DTSC approval. Protective fencing shall not identify the protected area as a cultural resource area in order to discourage unauthorized disturbance or collection of artifacts.

- Documentation of resource(s) on California Department of Parks and Recreation (DPR) 523 forms.
- Inspection of the resource(s) by a qualified archaeologist.
- Evaluation of the resource for listing in the California Register of Historical Resources (CRHR) (considering criteria 1 through 4) or as a unique archaeological resource, and as a contributor to the Simi Hills Archaeological District and/or the SSFL Traditional Cultural Property (TCP), following the research design established in the CRMP and consistent with the Simi Hills Archaeological District Study (Bray et al., 2017).

i. Treatment protocols for significant cultural resources that cannot be avoided and analysis of data in a regional context, consistent with Mitigation Measures CUL-4 (Avoidance and Preservation in Place) and CUL-6 (Inadvertent Discovery), which shall include, but not be limited to:

- A sufficient avoidance buffer, recommended by the S O I-qualified archaeologist, in coordination with the relevant RP, Interested Tribes, and with the approval of DTSC, to protect the resource until data recovery is completed.
- Sample excavation.
- Surface artifact collection.
- Site documentation.
- Special studies where sufficient data exists, as determined by the S O I-qualified archaeologist, including but not limited to radiocarbon dating, residue analysis, sourcing, and other materials analysis.
- Historical research, with the aim to target the recovery of important scientific data contained in the portion of the significant resource to be impacted by the project.
- Documentation, photography, and collection of oral histories.

Treatment for individual resources will be determined on a case-by-case basis by the SOI-qualified archaeologist, in coordination with the relevant RP, Interested Tribes (for prehistoric resources), and DTSC, and will depend on the nature of the resource and eligibility criteria. Treatment measures for affected resources shall be documented by the SOI-qualified archaeologist in a Work Plan for each site or group of sites.

j. A report documenting the methods and results of the treatment of the resource shall be prepared by the SOI-qualified archaeologist, following Archaeological Resources Management Report (ARMR) guidelines, and shall be submitted to DTSC for review and approval within 90 days of the completion of treatment, and shall also be submitted to the South Central Coastal Information Center (SCCIC).

k. Procedures for the appropriate treatment of human remains, consistent with Mitigation Measure CUL-18 (Human Remains).

l. Procedures for Tribal access.

m. Procedures for annual site condition verification, to document the condition of cultural resources throughout the life of the project and if impacts are observed, to provide additional protections, including but not limited to erosion controls and access barriers (consistent with Mitigation Measure CUL-8, Annual Site Condition Verification).

n. Health and safety requirements for cultural resources personnel working onsite, including 40-hour HAZWOPER training and copy of current certification for project records.

o. Reporting procedures, including the requirement that reports resulting from documentation, evaluation, and treatment of cultural resources be filed with the SCCIC annually by April 1 of each year for work completed during the previous calendar year.

p. Artifact collection, retention/disposal, and curation policies, including a statement that all cultural materials retained will be prepared in accordance with the requirements of an identified, qualified curatorial facility, per Mitigation Measure CUL-7 (Curation of Project Materials), and that the RPs shall be responsible for all expenses associated with the curation of the materials at the qualified curatorial facility.

q. Preparation of an Annual Report that includes all cultural resources related activities that occurred for the previous calendar year. The annual report

shall be submitted to DTSC for review and comment by March 1 of the year following the reporting year. The Annual Report shall include all documentation pertaining to Tribal communications required by Mitigation Measures CUL-11 through CUL-13, the Worker Cultural Resources Sensitivity Program required by Mitigation Measure CUL-3, the Annual Archaeological Monitoring Report with supporting documentation including daily logs required by Mitigation Measure CUL-5, all documentation resulting from eligibility evaluations and data recovery or other treatment resulting from Mitigation Measures CUL-4, and CUL-6, and the research design produced as part of the CRMP, and documentation resulting from the annual site condition verification program required by Mitigation Measure CUL-8; and

r. Biennial review of the effectiveness of the CRMP by DTSC, in coordination with the RPs, S O I-qualified archaeologist, and Interested Tribes, during the life of the project to determine the need for any revisions to the CRMP either based on new cultural resources discoveries or other new information for which the CRMP provides inadequate direction, or revisions necessary to address procedural inadequacies.

CUL-3: Worker Cultural Resources Sensitivity Program. A worker cultural resources sensitivity program shall be implemented for the project. Prior to any ground-disturbing activity, an initial sensitivity training session shall be provided by the RPs to all project employees, contractors, subcontractors, and other professionals prior to their involvement in any ground-disturbing activities, with subsequent training sessions occurring for new personnel prior to start of work in the field ~~on a quarterly basis to accommodate new personnel becoming involved in the project~~. The RPs shall invite Interested Tribes to participate in and present Native American perspectives during the training sessions if they so choose. The sensitivity program shall address: the cultural (Native American, archaeological, and paleontological) sensitivity of the project site and a tutorial providing information on how to identify these types of resources; appropriate behavior; worker access routes and restrictions; work area cleanliness; specific procedures to be followed in the event of an inadvertent discovery per the CRMP; safety procedures when working with monitors; and consequences in the event of noncompliance. The training shall incorporate the significant role that plants and animals, such as mountain lions, have in traditional and contemporary Native American lifeways. The RPs shall notify DTSC and the Interested Tribes no less than 2 weeks prior to the training sessions. The program agenda and materials together with attendance rosters for the previous year shall be provided to DTSC as part of the Annual Report due March 1 of each year. In addition, refreshers

shall occur during tailgate meetings prior to work in areas with known cultural resources or on a quarterly basis.

CUL-4: Avoidance and Preservation in Place.

CUL-5: Archaeological and Native American Monitoring.

CUL-6: Inadvertent Discovery of Potential Historical Resources and Unique Archaeological Resources.

CUL-7: Curation of Project Materials.

CUL-8: Annual Site Condition Verification.

CUL-9: Comprehensive District Study and National Register Nomination.

CUL-10: Burro Flats Site Complex Documentation and National Register Nomination.

CUL-11: Native American Document Review and Comment.

CUL-12: Native American Access.

CUL-13: Native American Communication.

CUL-14: Comprehensive Ethnographic Study. Within 6 months of project approval, the RPs shall retain, and DTSC shall have discretionary approval of, a qualified ethnographer with demonstrated expertise in the field of ethnography and cultural anthropology, to prepare a Comprehensive Ethnographic Study that documents the ethnographic context in which the SSFL TCP and contributing archaeological resources exist, focusing on the SSFL and surrounding Simi Hills. The qualified ethnographer shall be selected in coordination with Interested Tribes, to the extent that Interested Tribes elect to participate. The purpose of the Study will be to provide an ethnographic context for the SSFL TCP, to attempt to capture the significance and traditional cultural value ascribed to the SSFL TCP, and to provide a form of preservation and dissemination of Native American perspectives of the landscape (including plants and animals) and the places and material remains within it. The Study shall be prepared in coordination and collaboration with Interested Tribes, to the extent that Tribes choose to participate, and shall include interviews with representatives of Interested Tribes who express interest in participating. The draft Study shall be submitted to DTSC and Tribal Governments for review and comment within 2 years of the start of project activities. This effort may be coordinated with efforts that are being carried out in response to NASA's FEIS Cultural Mitigation Measure-3: Treatment of Traditional Cultural Property. Upon approval of DTSC, the ethnographic study completed in response to NASA's FEIS Cultural Mitigation Measure-3:

Treatment of Traditional Cultural Property may be used to satisfy the ethnographic study required by this measure.**CUL-15: Rock Art Site Recordation and Interpretation.**

CUL-16: Research Grant for Future Cultural Resources Studies.

2.3 Cumulative Impacts

2.3.1 Biological Resources: Cumulative Impacts

The cumulative analysis takes into account changes in the vicinity of the site, and research was conducted to identify potential new related projects since certification of the PEIR. No substantive projects would result in a significant change to the cumulative biological resources impact conclusions in the Certified PEIR. The additional projects were generally evaluated in combination with the project based on factors such as scale and location, anticipated timing of implementation, and proximity to the SSFL site.

Suitable habitat for the CBB and mountain lion exists onsite and within some of the areas in which cumulative projects are located. The project, in conjunction with cumulative projects, could incrementally impact sensitive and sensitive-status species, including the CBB and mountain lion, as well as the habitat. With implementation of Mitigation Measures BIO-1 (Critical Habitat and Listed Species Avoidance), BIO-6 (Revegetation Plan), BIO-20 (Seed Collection and Cuttings for Habitat Restoration), BIO-24 (Crotch's Bumble Bee), and BIO-25 (Mountain Lion Natal Den Survey and Avoidance), the project's contribution to cumulative impacts to sensitive or special-status species would be reduced to less than significant.

With regard to terrestrial wildlife and wildlife movement, the SSFL site provides important connectivity within the East Branch of the Santa Monica-Sierra Madre Landscape Linkage and mountain lions and their cubs are known to pass through and take residence on the SSFL site. The project, in conjunction with the cumulative projects in the surrounding area could incrementally impact wildlife movement and migration corridors. However, with the implementation of Mitigation Measures BIO-2 (Worker Environmental Awareness Program Training), BIO-6 (Revegetation Plan), BIO-12 (Wildlife Monitoring), BIO-20 (Seed Collection and Cuttings for Habitat Restoration), and BIO-22 (Wildlife Movement) the project's contribution to the cumulative impacts would be reduced to less than significant.

Conclusion

With implementation of the mitigation measures identified above, impacts to sensitive and special-status species, including the CBB and mountain lions as well as their habitats, and terrestrial wildlife movement and migration corridors would be less than significant. Biological resources impacted in the short-term with implementation of the

project, including temporary loss of sensitive habitats, would ultimately benefit in the long term from the remediation that would occur on the site. Thus, with the implementation of the mitigation measures, no new significant environmental impacts or substantial increase in the severity of a previously identified significant cumulative environmental impact would occur

2.4 Tribal Cultural Resources: Cumulative Impacts

The cumulative analysis takes into account changes in the vicinity of the site. and research was conducted to identify potential new related projects since certification of the PEIR. No substantive projects would result in a significant change to the cumulative tribal cultural resources impact conclusions in the Certified PEIR. The additional projects were generally evaluated in combination with the project based on factors such as scale and location, anticipated timing of implementation, and proximity to the project site.

Cumulative projects, which could bring additional people into the area, could also result in visual, auditory, and other environmental impacts that may adversely affect tribal cultural resources. For these reasons, the combined impacts on tribal cultural resources in the geographic scope would be considered cumulatively significant.

The SSFL TCP has traditional religious and cultural significance to several local tribes including the Chumash, Tongva/Gabrielino (including the Kizh Nation), and the Tataviam and possesses significant intrinsic value to these groups. In addition, mountain lions are animals that are considered essential for the preservation of Tribal traditional values. The project would result in the destruction and alteration of contributing elements of the SSFL TCP, such as the mountain lion community, which would result in a substantial adverse change to this tribal cultural resource and which would diminish the ability of the resource to convey its significance. Therefore, when considered in combination with the impacts of other projects in the cumulative scenario, the project would contribute incrementally to tribal cultural resources impacts.

With the implementation of Mitigation Measures CUL-1 (Cultural Resources Personnel Professional Qualifications), CUL-2 (Cultural Resources Management Plan), CUL-3 (Worker Cultural Resources Sensitivity Program), CUL-4 (Avoidance and Preservation in Place), CUL-5 (Archaeological and Native American Monitoring), CUL-6 (Inadvertent Discovery of Potential Historical Resources and Unique Archaeological Resources), CUL-7 (Curation of Project Materials), CUL-8 (Annual Site Condition Verification), CUL_9 (Comprehensive District Study and National Register Nomination), CUL-10 (Burro Flats Site Complex Documentation and National Register Nomination, CUL-11 (Native American Document Review and Comment), CUL-12 (Native American Access), CUL-13 (Native American Communication), CUL-14 (Comprehensive Ethnographic Study), CUL-15 (Rock Art Site Recordation and Interpretation), and CUL-16 (Research Grant for Future Cultural Resources Studies), in conjunction with Mitigation Measures

BIO-1 (Critical Habitat and Listed Species Avoidance), BIO-2 (Worker Environmental Awareness Program Training), BIO-6 (Revegetation Plan), BIO-12 (Wildlife Monitoring), BIO-19 (Sensitive Habitats), BIO-22 (Wildlife Movement), and BIO-25 (Mountain Lion Natal Den Survey and Avoidance), the project's contribution to cumulative impacts would be reduced; however, the project's cumulative contribution would remain significant and unavoidable.

Conclusion

Even with implementation of the mitigation measures identified above, cumulative impacts to the tribal cultural resources would be significant and unavoidable as determined in the Certified PEIR. Thus, no new significant environmental impact or substantial increase in the severity of a previously identified significant cumulative environmental impact would occur.

CHAPTER 3

Errata to the Final Certified PEIR

1. Introduction

This Errata makes minor and technical corrections and clarifications to the July 2023 Final Certified Program Environmental Impact Report (Certified PEIR) for the Santa Susana Field Laboratory (SSFL) project. This Errata was prepared by the Department of Toxic Substances Control (DTSC) in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The information added pursuant to this Errata does not disclose new significant impacts or findings. Nor does it contain significant new information that deprives the public of a meaningful opportunity to comment upon a substantial environmental impact. All information added pursuant to this Errata merely clarifies, corrects, adds to, or makes insignificant modifications to information in the Certified PEIR. DTSC has reviewed the information in this Errata and has determined that it does not change any of the basic findings or conclusions of the Certified PEIR, and thus does not constitute "significant new information" pursuant to CEQA Guidelines Section 15088.5, and therefore does not require recirculation of the Certified PEIR.

2. Specific Revisions to the Certified PEIR

Edits to the PEIR identified below include strikethrough to indicate deleted text and double underline to indicate added text. All edits are incorporated into the Certified PEIR via this Errata.

2.1 Updates to the PEIR's Mitigation Monitoring Reporting Plan[1]

Mitigation Measure AQ-3: Fugitive Dust Control

References to South Coast Air Quality Management District (SCAQMD) Rules were removed because the SSFL site is within the Ventura County Air Pollution Control District (VCAPCD) jurisdiction. This is not a substantive change because the air monitoring requirements remain the same.

Corrected Text

[1] Final PEIR, Chapter 4, Table 4-1.

"The RPs, under the direction of DTSC, shall monitor and control fugitive dust emissions by measures prescribed by VCAPCD Rule 55 and ~~SCAQMD Rules 403 and 403.1~~ identified below and documented in an approved Soil Management Plan (see Mitigation Measure AQ-4)…

~~SCAQMD Rule 403~~ Additional dust control measures which include, but are not limited to…

Reporting Requirements: Submittal of Soil Management Plan for DTSC approval in consultation with VCAPCD~~, SCAQMD,~~ and LARWQCB ~~Submittal of Form 403N to the SCAQMD~~

~~Submittal of Form 403N to the SCAQMD, every year. If all fugitive dust sources and corresponding control measures or special circumstances remain identical to those identified in the previously accepted submittal or in an AQMD- reviewed dust control plan, the resubmittal may be a simple statement of no-change (Form 403NC).~~

Enforcement Responsibility: DTSC in consultation with VCAPCD~~, SCAQMD,~~ and LARWQCB

Enforcement Method of Verification: The Soil Management Plan, which includes fugitive dust control measures, shall be reviewed and approved by DTSC in consultation with, VCAPCD~~, SCAQMD,~~ and LARWQCB

DTSC review of regular compliance reports documenting approved Soil Management Plan ~~and Form 403N submittal to SCAQMD~~"

Mitigation Measure AQ-4: Soil Management Plan

References to SCAQMD Rules were removed because the SSFL site is within the VCAPCD jurisdiction. Volatile Organic Compounds were updated to Reactive Organic Compounds for consistency with VCAPCD Rule 74.29. This is not a substantive change because the air monitoring requirements remain the same.

Corrected Text

"In addition to the fuels identified by Rule 74.29, the Soil Management Plan shall provide dust suppression for any active or inactive stockpile that is known or suspected to contain known ROC contaminants. ~~Additionally, requirements in the SCAQMD Rule 1166 will be implemented in the soil management plan where feasible to further reduce volatile organic compound (VOC) emissions.~~ Any equipment used in soil and groundwater operations will require a Permit to Operate from the VCAPCD, which will require compliance with VCAPCD Rule 74.29, Best Available Control Technology (BACT), Health Risk Assessment Requirements, and related requirements~~, and that BACT and VCAPCD rules will require compliance~~

~~with SCAQMD Rule 1166~~. The measures that shall be used to reduce ROC ~~and VOC~~ emissions include the following:

- To minimize emissions of ROCs to the atmosphere, active and inactive excavations and stockpiles of soil that contain gasoline, diesel fuel, jet fuel, or other known ROC contaminants, and emit ROCs in excess of 50 ppm above background, specifically as hexane, except non-repeatable momentary readings, shall be kept visibly moist by water spray, treated with a vapor suppressant, or covered with a continuous heavy-duty plastic sheeting (4 mil or greater) or other covering. The covering shall be overlapped at the seams and securely anchored to minimize headspace where vapors could accumulate.

- Monitoring of ROC emissions from soil stockpiles shall be performed as specified in VCAPCD Rule 74.29 ~~(for ROC) and SCAQMD Rule 1166 (for VOC).~~

- Monitor for ROC ~~VOC contamination pursuant to subdivision (e) of SCAQMD Rule 1166,~~ at least once every 15 minutes commencing at the beginning of excavation or grading and record all ROC ~~VOC~~ concentration readings.

- A person handling ROC ~~VOC~~-contaminated soil at or from an excavation or grading site shall: (A) segregate ROC ~~VOC~~-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. (B) Spray ROC ~~VOC~~-contaminated soil stockpiles with water and/or approved vapor suppressant and cover them with plastic sheeting for all periods of inactivity lasting more than one hour. (C) Conduct a daily visual inspection of all covered ROC ~~VOC~~- contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. A daily inspection record must be maintained onsite. ~~(D) Comply with the provisions in subparagraph (c)(1)(A) and clause (c)(1)(D)(i).~~ (D~~E~~) Maintain a record of the identification and business addresses of the generator, transporter and storage/treatment facilities. Such record shall be signed by each party at the time custody is transferred. (E~~F~~) Treat or remove contaminated soil from an excavation or grading site within 30 days, if feasible, from the time of excavation.

- If the ROC ~~VOC~~- concentration in the excavated soil is measured at greater than 1,000 ppm, spray the soil with water or vapor suppressant and: (A) As soon as possible, but not more than 15 minutes, place the soil in sealed containers, or (B) As soon as possible, but not more than 15 minutes, load

into trucks, moisten with additional water, cover and transport offsite, or (C) Implement other alternative storage methods approved in writing.

- A person treating ROC ~~VOC~~-contaminated soil shall: (A) Obtain a permit to construct and operate treatment equipment, as applicable, and (B) Implement ROC ~~VOC~~-contaminated soil decontamination measures, as approved in writing, which result in Best Available Control Technology applied during all segments, and which include but are not limited to, at least one of the following: (i) Installation and operation of an underground ROC ~~VOC~~ collection system and a disposal system prior to excavation. (ii) Collection and disposal of the ROC ~~VOC~~ from the excavated soil onsite using approved equipment (iii) Any equivalent ROC ~~VOC~~-contaminated soil control measure previously approved in writing.

- A person shall not engage in or allow any onsite or offsite spreading, grading or screening of ROC ~~VOC~~-contaminated soil, which results in uncontrolled evaporation of ROC ~~VOC~~- to the atmosphere.

- Loading trucks for contaminated soil must meet the following: (A) The truck and trailer shall be adequately tarped prior to leaving the site; no excavated materials shall extend above the sides or rear of the truck or trailer to prevent soil spillage during transport, and (B) The exterior of the truck, trailer and tires shall be cleaned off prior to the truck leaving the site.

Reporting Requirements: Submittal of Soil Management Plan for approval by DTSC in consultation with VCAPCD and LARWQCB

~~RPs to apply for a Site-Specific Mitigation Plan from the SCAQMD~~

Enforcement Requirements: DTSC in consultation with VCAPCD~~, SCAQMD,~~ and LARWQCB~~, and SCAQMD~~

The Soil Management Plan shall be reviewed and approved by DTSC in consultation with VCAPCD, ~~SCAQMD, and~~ LARWQCB~~; the Site-Specific Mitigation Plan shall be reviewed by SCAQMD, as well as any other applicable permits~~”

Mitigation Measure AQ-6: Valley Fever

Edits were made to the “Reporting Requirements” of the Implementation column to protect the confidentiality of site employees’ medical records and personal information. Instead, this mitigation measure will require the Responsible Parties (RPs) to submit a summary report that documents the steps taken in accordance with the California

Division of Occupational Safety and Health and VCAPCD regulations to reduce the potential Valley Fever impacts.

Corrected Text

"~~Documentation of employees' addresses and skin test results to be provided to DTSC as part of regular compliance reports~~ Provide summary report documenting steps taken in conformance with AQ-6."

Mitigation Measure BIO-2: Worker Environmental Awareness Program Training

Edits were made to the "Schedule/Timing" of the Implementation column for this mitigation measure. The intent of the edits was to clarify that program training material used to inform all construction workers of the sensitive habitat, plants, and wildlife shall be submitted to DTSC for approval prior to any ground disturbance or vegetation clearance within a sensitive habitat area.

Corrected Text

Schedule/Timing: "Submittal of Program training materials for approval by DTSC prior to ground disturbance. Provide training p~~P~~rior to initial vegetation or ground disturbance and to any new workers working in sensitive habitat areas"

Mitigation Measure BIO-6: Revegetation Plan

A minor addition was made to this mitigation measure to clarify that all clean topsoil used for revegetation purposes must be stored and conserved using standard industry conservation methods to retain and protect the beneficial and favorable soil qualities.

Corrected Text

"Clean topsoil that is preserved specifically for restoration purposes shall not be stored for greater than six months, unless standard conservation methods are being implemented, to minimize the potential for the soil to lose its beneficial qualities (e.g., soil microbials, beneficial fungi, and nutrients) and so that the topsoil does not degrade to the point that it is sterile with no future benefit to the biomass and restoration efforts."

Mitigation Measure BIO-9: Special-Status Invertebrates

A minor edit was made to improve the readability of this mitigation measure and to clarify that a qualified biologist shall catch and relocate species outside of the work area to the best of their ability.

Corrected Text

"If any of these species are found during the preconstruction surveys, a qualified biologist shall, to the best of their ability, carefully catch and release the species out of the work area and to a safe area containing suitable habitat."

Mitigation Measure BIO-10: Western Spadefoot

The consultation requirements of this mitigation measure were updated to include the United States Fish and Wildlife Service (USFWS).

Corrected Text

"To avoid potential impacts to western spadefoot, prior to any ground disturbance, a USFWS and CDFW-approved biologist, retained by the RPs, under direction of DTSC…"

Mitigation Measure BIO-12: Wildlife Monitoring

This mitigation measure was updated to clarify that the biologist shall coordinate with the RPs' contractors to ensure that all trash is properly disposed of such that it will not be accessible to wildlife.

Corrected Text

"Prior to the end of daily cleanup activities, the biologist shall coordinate with the contractor(s) to ensure all trash is properly disposed of such that it would not be accessible to wildlife."

Mitigation Measure BIO-19: Sensitive Habitats

This mitigation measure was updated to replace CDFW's "Survey of California Vegetation and Mapping Standards (2018)" with "current CDFW vegetation mapping standards." This edit was made to allow for use of the most current and most robust mapping standards issued by CDFW.

Corrected Text

"…a qualified biologist, retained by the RPs, under the direction of DTSC, shall characterize and map the habitats within cleanup areas in accordance with ~~CDFW's Survey of California Vegetation and Mapping Standards (CDFW, 2018)~~ current CDFW vegetation mapping standards."

Mitigation Measure BIO-21: Jurisdictional Wetlands and Waters

This mitigation measure was updated to clarify that a qualified biologist shall determine and mark the extent of the setback from the edge of jurisdictional resources, riparian vegetation, wetlands, and waters to maintain riparian and aquatic functions and values.

Corrected Text

"riparian vegetation, wetlands, and waters shall be avoided to the extent feasible, and appropriate ~~100-foot~~ setbacks shall be marked by a biologist from the edge of jurisdictional waters or riparian vegetation…"

Mitigation Measure CUL-1: Cultural Resources Personnel Professional Qualifications Standard

Edits were made to the "Reporting Requirements" of the Implementation column to clarify the forms in which written verification of a consultant's professional qualifications may be provided to DTSC for review and approval. The Annual Report submittal date was extended from March 1 of each reporting year to April 1 for consistency with the State Historic Preservation Officer (SHPO) report submittals.

Corrected Text

"Written verification of consultant's professional qualifications, which can be in the form of a certified statement indicating the project archaeologist is qualified pursuant to federal qualification requirements or copies of resumes, ~~including copies of consultants' degrees~~ certificates and/or training to be provided for DTSC approval."

Mitigation Measure CUL-2: Cultural Resources Management Plan

Edits were made to the "Reporting Requirements" of the Implementation column to clarify the forms in which written verification of a consultant's professional qualifications may be provided to DTSC for review and approval. The Annual Report submittal date was extended from March 1 of each reporting year to April 1 for consistency with the SHPO report submittals.

Corrected Text

"Written verification of consultant's professional qualifications~~, including copies of consultants' degrees, certificates and/or training~~ for DTSC approval.

Preparation of an Annual Report that includes all cultural resources related activities that occurred for the previous calendar year. The annual report shall be submitted to DTSC for review and comment by ~~March~~ April 1 of the year following the reporting year."

Mitigation Measure CUL-3: Worker Cultural Resources Sensitivity Program

The Annual Report submittal date was extended from March 1 of each reporting year to April 1 for consistency with the SHPO report submittals.

Corrected Text

"The program agenda and materials together with attendance rosters for the previous year shall be provided to DTSC as part of the Annual Report due ~~March~~ April 1 of each year."

Mitigation Measure CUL-5: Archaeological and Native American Monitoring

The Annual Report submittal date was extended from March 1 of each reporting year to April 1 for consistency with the SHPO report submittals.

Corrected Text

"Monitoring activities shall be summarized in the Annual Report required by Mitigation Measure CUL-2 to be submitted to DTSC annually on ~~March~~ April 1 for the previous calendar year."

Mitigation Measure CUL-6: Inadvertent Discovery of Potential Historical Resources and Unique Archaeological Resources

The Annual Report submittal date was extended from March 1 of each reporting year to April 1 for consistency with the SHPO report submittals.

Corrected Text

"Documentation resulting from eligibility evaluations and data recovery or other treatment occurring during the previous calendar year shall be made part of the Annual Report due to DTSC by ~~March~~ April 1 of the following calendar year as prescribed in Mitigation Measure CUL-2 (Preparation of a Cultural Resources Management Plan)."

Mitigation Measure CUL-8: Annual Site Condition Verification

The Annual Report submittal date was extended from March 1 of each reporting year to April 1 for consistency with the SHPO report submittals.

Corrected Text

"The Site Condition Assessment Forms, database spreadsheet, DPR 523 form updates, and documentation of the implementation of additional protective measures for resources where impacts are observed, shall be provided to DTSC annually by ~~March~~ April 1 for the previous calendar year as part of the Annual Report required by Mitigation Measure CUL-2 (Preparation of a Cultural Resources Management Plan)."

Mitigation Measure CUL-12: Native American Access

The Annual Report submittal date was extended from March 1 of each reporting year to April 1 for consistency with the SHPO report submittals.

Corrected Text

> "The annual report including all access-related communications is due to DTSC ~~March~~ April 1 for the previous calendar year"

Mitigation Measure CUL-13: Native American Communication

The Annual Report submittal date was extended from March 1 of each reporting year to April 1 for consistency with the SHPO report submittals.

Corrected Text

> "Outreach efforts between the Interested Tribes and the RPs shall be communicated by the RPs to DTSC on an annual basis during project activities for review and input, as part of the annual report due to DTSC on ~~March~~ April 1 of each year, as required by Mitigation Measure CUL-2 (Preparation of a Cultural Resources Management Plan)."

Mitigation Measure CUL-17: Paleontological Resources Monitoring and Mitigation Plan

A technical correction was made to define the test sample depths for use in soil and sediment screening for microfossils. The Annual Report submittal date was extended from March 1 of each reporting year to April 1 for consistency with the SHPO report submittals.

Corrected Text

> "The test sample shall consist of approximately 600~~0~~ pounds of sediment (or 0.4 cubic yards) to be screened onsite or offsite. If scientifically significant microfossils are recovered, a standard sample shall be collected and screened on or offsite (a standard sample is approximately 4 cubic yards or 6000 pounds per the SVP [2010] guidelines)."
>
> "The Annual Report shall be submitted to DTSC by ~~March~~ April 1 for the previous calendar year."

Mitigation Measure CUL-18: Inadvertent Discovery of Human Remains

A technical correction was made to include the correct CEQA citation set forth in California Health and Safety Code Section 7050.5.

Corrected Text

"On non-federally owned land (Area I, Area III, Area IV, the Northern Undeveloped Area, and the Southern Undeveloped Area), the RPs shall contact the Ventura County Coroner to evaluate the remains and follow the procedures and protocols set forth in ~~Section 15064.4(e)(1) of CEQA~~ State Health and Safety Code Section 7050.5."

Mitigation Measure GEO-1: Geotechnical Evaluation

Edits were made to the "Schedule/Timing" of the Implementation column for this mitigation measure. The intent of the edits was to clarify the timing of "prior to remediation" is meant to be prior to construction of remediation systems requiring foundations.

Corrected Text

"Prior to construction of remediation systems requiring foundations"

Mitigation Measure GHG-2: On-Road Vehicle Fleet Requirements

References to SCAQMD Rules were removed because the California Air Resource Board (CARB) administers the applicable rules.

Corrected Text

"A copy of each unit's certified tier specification, BACT documentation, and CARB ~~or SCAQMD~~ operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

Written documentation, including copies of each unit's certified tier specification, BACT documentation, and CARB ~~or SCAQMD~~ operating permit to be provided to DTSC"

Mitigation Measure HAZ-2: Hazardous Materials Containment

The reporting requirements for manifest data for export trucks, including vehicle license plates and time of departure were changed from weekly to monthly.

Corrected Text

"Copies of manifests shall be submitted ~~weekly~~ monthly to DTSC for review"

Mitigation Measure HYDRO-1: Stormwater Pollution Prevention Plan (SWPPP)

A technical correction was made to update the NPDES permit number associated with the General Permit for Stormwater Discharges Associated with Construction Activity.

The Los Angeles Regional Water Quality Control Board permit number was removed as it was duplicative.

Corrected Text

> "Site activities shall take place in accordance with the statewide General Permit for Stormwater Discharges Associated with Construction Activity (Order No. ~~2009~~2022-~~0009~~0057-DWQ [NPDES No. CAS000002])."
>
> "The RPs shall also continue monitoring drainages for increased sediment load and contaminants in accordance with the existing NPDES Permit No. CA0001309 ~~(also referred to under LARWQCB Order R4-2015-0033)~~ for stormwater discharges related to past industrial activity during each RP's remediation activities."

Mitigation Measure HYDRO-2: Operations and Maintenance Plan (O&M Plan)

A technical correction was made to clarify that soil vapor monitoring shall be included in the evaluation for effectiveness of the implemented remedial actions.

Corrected Text

> "To monitor the effectiveness of the implemented remedial actions, groundwater, surface water, and soil vapor monitoring shall be performed consistent with a DTSC-approved O&M Plan."

2.2 Other PEIR Updates

Final PEIR, Chapter 3, Response to Comment AF-1-259

DTSC made a correction to its response to Comment AF-1-259.

Comment AF-1-259:

> "*Page 4.4-112, Section 4.4.6, CUL-8: DTSC should delete or rewrite CUL-8. CUL-8 (Annual Site Condition Verification) introduces new requirements beyond the stipulations of the 2014 PA with the State of California that amount to rerecording all resources at SSFL twice a year. SCCIC is already notified when any change to a Cultural Resource is observed. CUL-8 provides no additional protection to cultural resources, and should be removed.*"

A portion of DTSC's response to the above comment mistakenly addressed CUL-2, but Comment AF-1-259 is in regards to CUL-8. The following edits to DTSC's response were made to delete the irrelevant portion.

Corrected Text

DTSC Response to AF-1-259

> "See response to comment AF-1-229, which addresses DTSC's authority and responsibility under CEQA to mitigate impacts and the relationship between mitigation measures identified in the Draft PEIR and requirements under the PA and ICRMP. ~~As indicated in response to comment AF-1-231, Mitigation Measure CUL-2 has been revised so that each RP can prepare a separate CRMP as long as it meets the requirements of the mitigation measure. Regarding the comment about frequency, although resources will be inspected once a year using a systematic form and database, only those resources where changes in the setting or condition are observed would be updated on DPR 523 forms.~~"

Draft PEIR, Chapter 4.3, Impact 4.3-6a (p. 4.3-122)

DTSC corrected a minor technical error. The Revised Draft PEIR (which is incorporated into the Final PEIR), erroneously stated that a United States Fish and Wildlife Service (USFWS) Biological Opinion had not yet been issued. However, DTSC received the Biological Opinion and will consider this document in parallel with cleanup decision documents to determine where to apply AOC exceptions to protect biological resources.

Corrected Text

> "However, as discussed above, ~~since a BO has not yet been issued by USFWS,~~ DTSC has not yet determined specifically where to apply ~~an~~ AOC exception<u>s</u> to protect resources. DTSC will make any exception determinations during review of the various cleanup decision documents"

Draft PEIR, Chapter 4.6, Impact 4.6-2a (p. 4.6-19)

DTSC corrected a minor editorial error. The Revised Draft PEIR (which is incorporated into the Final PEIR), erroneously cited "VCAQMD" Rule 10 instead of "VCAPCD" Rule 10 as an APCD requirement.

Corrected Text

> "The overall site cleanup activities would comply with APCD requirements, including ~~VCAQMD~~ VCAPCD Rule 10 which requires a permit to construct."

Draft PEIR, Chapter 4.7, Impact 4.7-1b (p. 4.7-40)

DTSC corrected a minor editorial error in the Revised Draft PEIR (which is incorporated into the Final PEIR). The reference to Scenario 3 and HAZ-5 was corrected to reference Scenarios 1, 2, and 3.

Corrected Text

"With regard to handling and transport of radioactive materials, radiation exposure would be reduced to less-than-significant levels with implementation of Mitigation Measures TRANS-1~~,~~ and HAZ-2 ~~and HAZ-5~~. As shown in Table ~~4.7-7~~ 4.7-8, ~~Scenario 3 would incorporate HAZ-5 reducing~~ the maximum annual risk ~~to 86~~ for Scenarios 1, 2, and 3 would be 0.0034 mrem, which is below the DOE limit of 100 mrem."

Draft PEIR, Chapter 8, Table 8-1, Noise (p. 8-3)

DTSC corrected a minor editorial error in the Revised Draft PEIR (which is incorporated into the Final PEIR). Table 8-1 was updated for consistency with the text on Page 5-42.

Corrected Text

"Cumulative development along with the project would increase the peak hour traffic noise levels by a maximum of 7.8 dBA and 6.3 dBA, on the roadway segments of Woolsey Canyon Road, between Valley Circle Boulevard and Knapp Ranch Road and Facility Road at Woolsey Canyon Road, while all of the other study roadway segments would experience an increase in peak hour traffic noise levels of less than 3 or 5 dBA over existing conditions. As the roadway segments of Woolsey Canyon Road between Valley Circle Boulevard and Knapp Ranch Road and Facility Road at Woolsey Canyon Road would experience more than a 5 dBA increase in peak hour traffic noise levels, the cumulative traffic noise impacts on this roadway segment would be cumulatively significant."